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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

3 14 70421

NC

IN RE: CRIMINAL COMPLAINT

AFFIDAVIT OF SPECIAL AGENT EMMANUEL  
V. PASCUA IN SUPPORT OF COMPLAINT

I, Emmanuel V. Pascua, Special Agent with the Federal Bureau of Investigation, being duly  
sworn, depose and state that:

**I. BACKGROUND**

**A. AGENT QUALIFICATIONS**

I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since  
August 2004. During my employment as a Special Agent, I have been tasked with domestic terrorism  
and organized crime investigations. Based on these investigations, I have gained experience in the use

1 of law enforcement techniques including the use of confidential sources, undercover operations, physical  
2 surveillance tools such as pole cameras, recorders, and global position satellite enabled tracking devices,  
3 and other electronic surveillance tools such as body wires and transmitters. Additionally, I have gained  
4 experience in analyzing telephone toll records, financial records and utility records. I have been  
5 involved in operations and investigations involving drug evidence and the utilization of buy/bust  
6 techniques since 2004. I have received additional training on financial investigations, specifically  
7 investigations dealing with money laundering activities.  
8

9 As a result of my experience, I have encountered and become familiar with the day to day operations  
10 and the various practices of individuals involved in organized crime. I have also consulted and  
11 discussed these types of investigations with federal agents, state and local police officers, and attorneys  
12 who are experienced in investigations involving organized crime. I have discussed the topic of firearms  
13 trafficking with two FBI Firearms Instructors, specifically on the topic of items indicative of firearms  
14 trafficking.  
15

16 I have been an affiant on one Title III affidavit involving subjects named in section II of this affidavit  
17 engaged in organized crime activity and have participated in at least three other investigations involving  
18 the interception of communications pursuant to Title III. As a result of this experience, I am familiar  
19 with the use of wiretaps as an investigative technique.  
20

21 I have been an affiant on at least 13 search warrants for residences, vehicles, electronic devices, DNA  
22 and cellular telephone GPS information. The majority of these search warrants involved the  
23 investigation of organized criminal activity.

24 I am an investigative or law enforcement officer of the United States, within the meaning of 18 U.S.C.  
25 § 2510(7), and am empowered by law to conduct investigations of and to make arrests for offenses  
26 enumerated in 18 U.S.C. § 2516.  
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28 I am making this affidavit in support of a complaint for the issuance of arrest warrants for the

1 Targets included in Part B of this Section of the affidavit, for violations of the Statutes included in Part  
 2 C of this Section of the affidavit.

3  
 4 **B. COMPLAINANTS**

5 **Kwok Cheung CHOW, a/k/a Raymond Chow, a/k/a Shrimp Boy, a/k/a Ha Jai** (hereinafter  
 6 CHOW) is a 54-year old Chinese citizen who is believed to reside in San Francisco, California. Based  
 7 on publicly available information as well as information from confidential human sources and other  
 8 sources of information, CHOW is currently the Dragonhead, or leader, of the San Francisco-based Chee  
 9 Kung Tong organization (herein "CKT").<sup>[1]</sup> CHOW's criminal history includes a guilty plea in federal  
 10 court for racketeering, involving murder for hire, conspiracy to distribute heroin, arson, and conspiracy  
 11 to collect extensions of credit. He also has state felony convictions for robbery using a firearm and  
 12 assault with a firearm on a person, and served time in state prison on both charges. He is currently in  
 13 this country while awaiting resolution of an application to U.S. Immigration and Customs Enforcement  
 14 (ICE) to obtain an S-visa (which is a type of visa issued to witnesses in criminal proceedings). As a  
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17  
 18 <sup>[1]</sup> The CKT is believed to be an offshoot of the Hung Mun. Based on my review of open source  
 19 information, I am aware that the Hung Mun, also referred to as a Chinese secret society and the Chinese  
 20 Freemasons, among other names, began in China sometime in the mid-17th century as a result of a  
 21 revolutionary movement to overthrow the Manchu-ruled Qing Dynasty in China. The Qing Dynasty  
 22 lasted roughly from 1644 to 1911. The Hung Mun were aggressively pursued and punished by the Qing  
 23 Dynasty rulers throughout their existence. This persecution, along with cultural and economic  
 24 influences drove these societies underground, causing them to adopt secretive customs, rules,  
 25 ceremonies and operating procedures. Hung Mun members who emigrated from China throughout the  
 26 world in the mid-late 19th century brought their Hung Mun customs and rituals with them to their new  
 27 homes abroad and numerous organizations sprung from these Hung Mun roots. Many of these  
 28 organizations became known as Tongs in the United States. Many of the Tongs maintained their  
 secretive hierarchies, rituals and ceremonies but were able to operate much more openly outside China  
 without the threat of government persecution and retribution. Most Tongs shared the political goal of  
 overthrowing the Manchu dynasty that ruled China; however, some were purely social groupings that  
 focused on mutual aid and recreation for members. Others served administrative and judicial functions  
 within the community, allocating business locations and cemetery sites, settling disputes, and enforcing  
 the payment of debts. Still others engaged in criminal activities: protection rackets, extortion, and  
 strong-arm methods for controlling such tolerated vices as gambling and prostitution.  
 One such organization which later became one of the strongest and most influential in North America is  
 the Chee Gung Tong, or Chee Kung Tong, also known as the CKT, headquartered in San  
 Francisco. The CKT and its criminal activities have been of interest to law enforcement since at least as  
 early as 2006, when the CKT's previous Dragonhead, Allen Leung, was murdered in San Francisco.

1 result of this application, CHOW currently wears an ankle bracelet and is under the supervision of an  
2 ICE deportation officer. According to a plea agreement that CHOW signed when pleading guilty to  
3 federal racketeering charges in 2000, CHOW was at that time an admitted member of the San  
4 Francisco-based Hop Sing Tong (herein "HST")[2] and one of the leaders of criminal activities engaged  
5 in by the underlings of this organization. As part of his role in this organization, CHOW engaged in  
6 such activities as heroin and cocaine trafficking, attempted murder, arson, robbery, gambling and  
7 extortionate credit transactions. CHOW was sentenced to a total of 160 months on these charges, but  
8 ultimately served a shorter sentence after receiving consideration for cooperating in United States v.  
9 Chong, CR-92-00260-DLJ. In August of 2006, after being released from federal incarceration, CHOW  
10 was sworn in as the new Dragonhead, or leader, of the CKT, soon after the murder of the previous  
11 Dragonhead, Allen Ngai Leung; that murder remains unsolved. News of CHOW's rise to the  
12 Dragonhead position was reported in local Chinese media sources, and was also reported to the FBI by  
13 multiple confidential sources; as a result, both the San Francisco Police Department and the FBI  
14 conducted surveillance at his swearing-in. Based on information that has been received by FBI agents  
15 from confidential human sources, as CKT Dragonhead CHOW holds a "489" position in the Triad,  
16 which is an internationally-based Chinese organized crime group. The "489" position signifies supreme  
17 authority within the Triad, and is consistent with CHOW's position as Dragonhead of the CKT. Also  
18 according to confidential human sources, CHOW is believed to have ties with Triad members in China  
19 and Hong Kong. Also, according to information received by the FBI, CHOW is currently, or was until  
20 recently, the leader of the Hop Sing Gang, a local San Francisco street gang that has approximately  
21 200-300 members. As discussed in further detail below, CHOW has used his position in these  
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26 [2]My review of information relating to the HST leads me to believe that, much like the CKT, it was at  
27 one time a civic organization within the Chinese community that became involved in criminal activity as  
28 a result of Asian organized crime influences. The HST and its criminal activities have been of interest  
to law enforcement since at least as early as the 1990s, when the HST was being investigated for its  
connections to Asian organized crime.

1 organizations to sanction and encourage George NIEH and other Target Subjects to engage in money  
2 laundering and possibly other criminal activities with an undercover employee (UCE) of the FBI. I  
3 believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHOW  
4 has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and  
5 (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title  
6 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); Title 18, United States  
7 Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate  
8 Commerce); and Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and  
9 Trafficking in Contraband Cigarettes).

11 **Leland Yin YEE, a/k/a California State Senator Leland Yee, a/k/a Uncle Leland** (hereinafter  
12 SENATOR YEE) is a 65 year-old U.S. citizen believed to reside in San Francisco, California.  
13 SENATOR YEE currently represents California legislative District 8, which encompasses San Mateo  
14 County and part of San Francisco County. Senator YEE's term will end on December 16, 2014.  
15 SENATOR YEE unsuccessfully ran for Mayor of San Francisco in the election held on November 8,  
16 2011, and is currently running for California Secretary of State in an election to be held in November  
17 2014. As further detailed below, SENATOR YEE and KEITH JACKSON were involved in a scheme to  
18 defraud the citizens of California of their rights to honest services, and SENATOR YEE, LIM and  
19 KEITH JACKSON were involved in a conspiracy to traffic firearms. I believe that the facts detailed  
20 below are sufficient to demonstrate probable cause to believe that SENATOR YEE has violated the  
21 following criminal statutes: Title 18, United States Code, Section 1343 and 1346 (Wire Fraud of Honest  
22 Services); Title 18, United States Code, Sections 371, 922(a)(1) and 922(l) (Conspiracy to Deal  
23 Firearms Without a License and to Illegally Import Firearms).

26 **Keith JACKSON** (hereinafter KEITH JACKSON) is a 49 year-old United States citizen,  
27 believed to reside in San Francisco, California. KEITH JACKSON works as a political consultant.  
28

1 KEITH JACKSON has no known criminal convictions. As further detailed below, KEITH JACKSON  
2 was involved in a scheme to defraud of honest services, a murder for hire conspiracy, gun trafficking,  
3 and drug trafficking conspiracy. I believe that the facts detailed below are sufficient to demonstrate  
4 probable cause to believe that KEITH JACKSON has violated the following criminal statutes: Title 18,  
5 United States Code, Section 1343 and 1346 (Wire Fraud of Honest Services); Title 21, United States  
6 Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1)  
7 and 2 (Dealing in Firearms Without a License); Title 18, United States Code, Sections 371, 922(a)(1)  
8 and 922(l) (Conspiracy to Deal Firearms Without a License and to Illegally Import Firearms); and Title  
9 18, United States Code, Section 1958 (Murder for Hire).

11 **Kevin SIU, a/k/a Dragon Tin Loong Siu** (hereinafter SIU). SIU is a 30 year-old U.S. citizen  
12 who is believed to reside in Daly City, California. SIU has two prior arrests; one for prostitution and  
13 another related to loitering to commit prostitution. He is believed to own a business which is involved  
14 in the sale of electronic cigarettes. As described in further detail below, CHOW and NIEH introduced  
15 SIU to a UCE as someone who could launder money. Since then, SIU engaged in several money  
16 laundering transactions with a UCE. SIU also told a UCE that SIU was a member of the CKT, or  
17 possibly the CKT's secretary; however, as described in further detail below, SIU and CHOW have since  
18 had a falling-out. Accordingly, SIU's current relationship to the CKT is unknown. I believe that the  
19 facts detailed below are sufficient to demonstrate probable cause to believe that SIU has violated the  
20 following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money  
21 Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity).

24 **George NIEH, a/k/a Heng Nieh, a/k/a Ah Fei** (hereinafter NIEH) is a 44 year-old U.S. citizen  
25 who is believed to reside in San Francisco, California. According to California state employment  
26 records, he has no known employment records for the last three years. NIEH has a previous California  
27 state felony conviction for assault. NIEH has told a UCE that NIEH is a member of the CKT. NIEH  
28



1 has claimed to a UCE that he is the leader of the Wah Ching, a local street gang, with approximately 60  
2 members. NIEH claims to be a close associate and driver of CHOW. I believe that the facts detailed  
3 below are sufficient to demonstrate probable cause to believe that NIEH has violated the following  
4 criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money  
5 Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States  
6 Code, Section 1956(a)(1)(A) and (B) (Money Laundering); Title 18, United States Code, Sections 371,  
7 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce); Title  
8 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in  
9 Contraband Cigarettes); Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics);  
10 Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title  
11 18, United States Code, Section 922(g)(1) (Felon in Possession of a Firearm).  
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13  
14 **Alan CHIU, a/k/a Alan Shiu** (hereinafter CHIU) is a 58 year-old U.S. citizen who is believed to  
15 reside in San Francisco, California. He has no known criminal history. He is believed to currently be  
16 employed by Men's Wearhouse, Inc. Based on representations made to a UCE by CHIU, NIEH and  
17 others, CHIU is believed to be a member of the CKT and a close associate of CHOW. I believe that the  
18 facts detailed below are sufficient to demonstrate probable cause to believe that CHIU has violated the  
19 following criminal statute: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money  
20 Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity).  
21

22 **Xiao Cheng MEI, a/k/a Michael Mei** (hereinafter MEI) is a 30 year-old U.S. citizen, believed  
23 to reside in Daly City, California. MEI has no known criminal history. MEI is a close associate of  
24 CHOW and NIEH, and is also believed to be a CKT member. NIEH stated to UCE 4599 that MEI  
25 would be a potential business associate regarding marijuana cultivation and distribution. NIEH has  
26 further stated to UCE 4599 that MEI is vying for a position within the CKT similar to the position SIU  
27 previously held. NIEH advised UCE 4599 that MEI may also be a supplier for firearms. As described  
28

1 in further detail below, a search warrant was executed at a residence in Antioch and was suspected to be  
2 a marijuana grow house belonging to MEI. I believe that the facts detailed below are sufficient to  
3 demonstrate probable cause to believe that SIU has violated the following criminal statute: Title 21,  
4 United States Code, Section 846 (Conspiracy to Distribute Narcotics).

5 **Andy LI, a/k/a Andy Man Lai LI, a/k/a Andy M. LI** (hereinafter LI) is a 40 year-old U.S.  
6 citizen, believed to reside in South San Francisco, California. LI has a misdemeanor conviction for  
7 arson dating from June 1992 in California. LI also has a felony conviction for being an accessory to  
8 robbery in July 1993 in California. LI also has federal felony convictions for theft from interstate  
9 shipments, in violation of 18 U.S.C. § 659. LI in past was a close associate of CHOW, but recently had  
10 an altercation with CHOW causing their relationship to end. LI may no longer be a CKT member. As  
11 described in further detail below, LI has engaged in money laundering (proceeds are believed to be from  
12 illegal drug trafficking), sold controlled substances to a FBI UCE, conspired to distribute controlled  
13 substances with an FBI UCE, facilitated the sale of a firearm to an FBI UCE and provided a ballistic  
14 vest to an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause  
15 to believe that LI has violated the following criminal statutes: Title 18, United States Code, Section  
16 1956(a)(1)(A) and (B) (Money Laundering); Title 21, United States Code, Section 846 (Conspiracy to  
17 Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms  
18 Without a License); and Title 18, United States Code, Section 922(g)(1) (Felon in Possession of a  
19 Firearm).

20 **Kongphet CHANTHAVONG, a/k/a Joe** (hereinafter CHANTHAVONG) is a 36 year old  
21 Thailand citizen who is believed to reside in San Francisco, California. U.S. Immigration records show  
22 that CHANTHAVONG has an outstanding warrant of deportation; however, country conditions  
23 preclude deportation. CHANTHAVONG's criminal history includes two state felony convictions for the  
24 possession and/or purchase of cocaine base for sale, and a felony conviction for conspiracy to export  
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1 stolen vehicles. CHANTHAVONG was at one time a CKT member and close associate of CHOW, but  
2 because of his affiliation with LI, it is believed that CHANTHAVONG no longer has a relationship with  
3 CHOW, nor is he a member of the CKT. CHANTHAVONG was recently introduced by NIEH to a FBI  
4 UCE as a marijuana trafficker. As described in further detail below, CHANTHAVONG has distributed  
5 controlled substances, conspired to distribute controlled substances with an FBI UCE and firearms  
6 trafficking. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe  
7 that CHANTHAVONG has violated the following criminal statutes: Title 21, United States Code,  
8 Section 846 (Conspiracy to Distribute Narcotics); Title 21, United States Code, Section 841 (Possession  
9 with Intent to Distribute Narcotics); Title 18, United States Code, Section 924(c) (Possession of a  
10 Firearm in Furtherance of a Drug Trafficking Crime); Title 18, United States Code, Section 922(a)(1)  
11 and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 922(g)(1)  
12 (Felon in Possession of a Firearm).

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15 **Jane Miao Xhen LIANG, a/k/a Jane LIANG** (hereinafter JANE LIANG) is a 35 year-old U.S.  
16 citizen, believed to reside in Daly City, California. JANE LIANG does not have a criminal history. As  
17 detailed further below, JANE LIANG has facilitated a purported stolen liquor transaction with an FBI  
18 UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that  
19 JANE LIANG has violated the following criminal statutes: Title 18, United States Code, Sections 371,  
20 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce).

21  
22 **Tina Yao Gui LIANG, a/k/a Tina LIANG** (hereinafter TINA LIANG) is a 39 year-old U.S.  
23 citizen, believed to reside in Concord, CA. TINA LIANG has no known criminal history. TINA  
24 LIANG is an associate of CHOW. CHOW directly introduced TINA LIANG to an FBI UCE to conduct  
25 criminal activity. As detailed further below, TINA LIANG participated in a purportedly stolen liquor  
26 transaction with an FBI UCE and is believed to be involved in cultivating and distributing marijuana. I  
27 believe that the facts detailed below are sufficient to demonstrate probable cause to believe that TINA  
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1 LIANG has violated the following criminal statutes: Title 18, United States Code, Sections 371, 2314,  
2 and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce) and Title 21,  
3 United States Code, Section 846 (Conspiracy to Distribute Narcotics).

4 **Bryan TILTON** (hereinafter TILTON) is a 37 year-old U.S. citizen, believed to reside in Daly  
5 City, California. TILTON has no known criminal convictions. TILTON is an associate of TINA  
6 LIANG and JANE LIANG. As detailed further below, TILTON participated in a purportedly stolen  
7 liquor transaction with an FBI UCE and is believed to be involved in cultivating and distributing  
8 marijuana. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe  
9 that TILTON has violated the following criminal statutes: Title 18, United States Code, Sections 371,  
10 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce) and Title  
11 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

12  
13 **Huan Ming MA, a/k/a Ming MA, a/k/a Bak Baan** (hereinafter MA) is a 29 year-old U.S.  
14 Legal Resident, believed to reside at in San Francisco, California. MA has no known criminal  
15 convictions. MA is a member of the CKT and holds the position of Enforcer. Detailed further below,  
16 MA facilitated the purchase of purportedly stolen liquor with an FBI UCE. I believe that the facts  
17 detailed below are sufficient to demonstrate probable cause to believe that MA has violated the  
18 following criminal statutes: Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to  
19 Receive and Transport Stolen Property in Interstate Commerce).

20  
21 **Hon Keung SO, a/k/a Hon SO** (hereinafter SO) is a 55 year-old United States Legal Resident,  
22 believed to reside in Alameda, California and to own the New Asian Restaurant in San Francisco,  
23 California. SO was state convicted of driving under the influence (DUI) in February 2003. SO is  
24 known to host many of the CKT events at the New Asia Restaurant and has purchased purportedly  
25 stolen liquor from an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate  
26 probable cause to believe that MA has violated the following criminal statutes: Title 18, United States  
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1 Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate  
2 Commerce).

3 **Albert NHINGSAVATH, a/k/a AI NHINGSAVATH** (hereinafter NHINGSAVATH) is a 32  
4 year-old U.S. citizen, believed to reside in San Francisco, California. NHINGSAVATH's criminal  
5 history includes one federal felony conviction for distribution of MDMA, in violation of 21 U.S.C. §  
6 846 in May 2005. NHINGSAVATH is a close associate of LI and CHANTHAVONG. As detailed  
7 further below, NHINGSAVATH engaged in money laundering (proceeds are believed to be from illegal  
8 drug trafficking) and conspired to distribute controlled substances with an FBI UCE. I believe that the  
9 facts detailed below are sufficient to demonstrate probable cause to believe that CHANTHAVONG has  
10 violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B)  
11 (Money Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute  
12 Narcotics).  
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15 **Norge Ronald MASTRANGELO** (hereinafter MASTRANGELO) is a 37 year-old United  
16 States citizen, believed to reside in San Francisco, California. MASTRANGELO's criminal history  
17 includes a state misdemeanor conviction for criminal possession of a Controlled Substance – 7th degree  
18 in New York. As further detailed below, MASTRANGELO was involved in money laundering with an  
19 FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe  
20 that MASTRANGELO has violated the following criminal statutes: Title 18, United States Code,  
21 Section 1956(a)(1)(A) and (B) (Money Laundering).  
22

23 **Anthony John LAI, a/k/a AJ** (hereinafter LAI) is a 26 year-old U.S. citizen, believed to reside  
24 in Daly City, California. LAI is an associate of GEE and ELAINE LIANG. LAI has no known criminal  
25 convictions. As detailed further below, LAI was involved in money laundering (proceeds are believed  
26 to be from illegal drug trafficking) with an FBI UCE and conspired to distribute illegal drugs. I believe  
27 that the facts detailed below are sufficient to demonstrate probable cause to believe that LAI has violated  
28

1 the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money  
2 Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

3 **Serge GEE, a/k/a John** (hereinafter GEE) is a 28 year-old United States citizen, believed to  
4 reside in Cupertino, California. GEE's criminal history includes battery as a juvenile with no  
5 disposition. As further detailed below, GEE was involved in money laundering with an FBI UCE and  
6 the distribution of illegal drugs. I believe that the facts detailed below are sufficient to demonstrate  
7 probable cause to believe that GEE has violated the following criminal statutes: Title 18, United States  
8 Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21, United States Code, Section  
9 846 (Conspiracy to Distribute Narcotics).

11 **Gary Kwong Yiu CHEN, a/k/a Gary CHEN, a/k/a Jimmy, a/k/a David** (hereinafter CHEN)  
12 is a 25 year-old U.S. citizen, believed to reside in San Francisco, California. CHEN has no criminal  
13 convictions. CHEN is the associate of GEE and ELAINE LIANG. As detailed further below, CHEN  
14 was involved with money laundering (proceeds are believed to be from illegal drug trafficking) with an  
15 FBI UCE and a conspiracy to distribute illegal drugs. I believe that the facts detailed below are  
16 sufficient to demonstrate probable cause to believe that CHEN has violated the following criminal  
17 statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21,  
18 United States Code, Section 846 (Conspiracy to Distribute Narcotics).

20 **Xiu Ying Ling LIANG, a/k/a Elaine LIANG** (hereinafter ELAINE LIANG) is a 51 year-old  
21 U.S. Legal Resident, believed to reside in Cupertino, California. ELAINE LIANG's criminal history is  
22 a DUI state misdemeanor. As detailed further below, ELAINE LIANG was involved in money  
23 laundering with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate  
24 probable cause to believe that ELAINE LIANG has violated the following criminal statutes: Title 18,  
25 United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering).

1 **Leslie YUN, a/k/a Leslie Yunchung, a/k/a Leslie Yuong** (hereinafter YUN) is a 42 year old  
 2 United States Citizen, believed to reside in Oakland, California. YUN was federally convicted on 3  
 3 counts of forgery in January of 1996. YUN is a close associate of CHOW and is a director for the Ghee  
 4 Kung Tong Supreme Lodge Chinese Freemasons of the World (a/k/a CKT) in a 2012 tax filing.<sup>1</sup> As  
 5 described in further detail below, YUN was involved in conducting money laundering transactions,  
 6 purchased purportedly stolen cigarettes and known to traffic marijuana. I believe that the facts detailed  
 7 below are sufficient to demonstrate probable cause to believe that YUN has violated the following  
 8 criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money  
 9 Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States  
 10 Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate  
 11 Commerce); Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and  
 12 Trafficking in Contraband Cigarettes); and Title 21, United States Code, Section 846 (Conspiracy to  
 13 Distribute Narcotics).

14 **Yat Wah PAU, a/k/a James PAU** (hereinafter PAU) is a 55 year-old Naturalized United States  
 15 citizen, believed to reside in Oakland, California. PAU has no known criminal convictions. PAU is a  
 16 director for the Ghee Kung Tong Supreme Lodge Chinese Freemasons of the World (a/k/a CKT) in a  
 17 2012 tax filing. PAU is a long time CKT member and associate of CHOW. As described in further  
 18 detail below, PAU was involved in conducting money laundering transactions and purchasing  
 19 purportedly stolen cigarettes. I believe that the facts detailed below are sufficient to demonstrate  
 20 probable cause to believe that YUN has violated the following criminal statutes: Title 18, United States  
 21 Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of  
 22 Specified Unlawful Activity); Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy  
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27 <sup>1</sup> The Ghee Kung Tong Supreme Lodge is commonly referenced as the Chee Kung Tong (CKT).  
 28 The Chee Kung Tong spelling or reference is often considered the transliteration of the Ghee Kung Tong  
 spelling. Any references in section II of this affidavit to the Ghee Kung Tong is synonymous to the  
 Chee Kung Tong.

1 to Receive and Transport Stolen Property in Interstate Commerce); Title 18, United States Code,  
2 Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in Contraband Cigarettes).

3 **Brandon Jamelle JACKSON** (hereinafter BRANDON JACKSON) is a 28 year-old United  
4 States citizen, believed to reside in San Francisco, California. BRANDON JACKSON has no criminal  
5 convictions. BRANDON JACKSON is the son and criminal associate of KEITH JACKSON and the  
6 associate of Marlon SULLIVAN. As detailed further below, BRANDON JACKSON was involved in a  
7 murder for hire conspiracy, gun trafficking, and drug trafficking conspiracy. I believe that the facts  
8 detailed below are sufficient to demonstrate probable cause to believe that BRANDON JACKSON has  
9 violated the following criminal statutes: Title 21, United States Code, Section 846 (Conspiracy to  
10 Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms  
11 Without a License); and Title 18, United States Code, Section 1958 (Murder for Hire).  
12

13 **Marlon Darrell SULLIVAN** (hereinafter SULLIVAN) is a 29 year-old U.S. citizen, believed to  
14 reside in Oakland, California. SULLIVAN works as a sports agent. SULLIVAN has no known  
15 criminal convictions. SULLIVAN is an associate of KEITH JACKSON and BRANDON JACKSON.  
16 As detailed further below, SULLIVAN was involved in a murder for hire conspiracy, gun trafficking,  
17 drug trafficking conspiracy and the sale of fraudulent credit cards. I believe that the facts detailed below  
18 are sufficient to demonstrate probable cause to believe that SULLIVAN has violated the following  
19 criminal statutes: Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title  
20 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18,  
21 United States Code, Section 1958 (Murder for Hire).  
22

23 **Rinn ROEUN** (hereinafter ROEUN) is a 30 year-old United States Legal Resident, believed to  
24 reside in San Francisco, California. ROEUN's criminal history includes multiple state felony arrests as  
25 a juvenile with no disposition on record. As further detailed below, ROEUN was involved in selling  
26 multiple firearms to an FBI UCE and conspired to commit a murder for hire for an FBI UCE. I believe  
27  
28



1 that the facts detailed below are sufficient to demonstrate probable cause to believe that ROEUN has  
 2 violated the following criminal statutes: Title 18, United States Code, Section 922(a)(1) and 2 (Dealing  
 3 in Firearms Without a License); and Title 18, United States Code, Section 1958 (Murder for Hire).

4 **Wilson Sy LIM, a/k/a Dr. Lim** (hereinafter LIM) is a 60 year-old U.S.citizen, believed to reside  
 5 in Daly City, California. LIM has no known criminal record. LIM is an associate of SENATOR YEE  
 6 and KEITH JACKSON. As further detailed below, LIM, SENATOR YEE and KEITH JACKSON were  
 7 involved in a conspiracy to traffic firearms. I believe that the facts detailed below are sufficient to  
 8 demonstrate probable cause to believe that LIM has violated the following criminal statutes: Title 18,  
 9 United States Code, Sections 371, 922(a)(1) and 922(l) (Conspiracy to Deal Firearms Without a License  
 10 and to Illegally Import Firearms).

11  
 12 **C. STATUTES VIOLATED**

13 **Title 18, United States Code, Section 1956(a)(3)(A) and (B)** provides:

14  
 15 “Whoever, with the intent . . . to promote the carrying on of specified unlawful activity; [or] to conceal  
 16 or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of  
 17 specified unlawful activity . . . conducts or attempts to conduct a financial transaction involving property  
 18 represented to be the proceeds of specified unlawful activity, or property used to conduct or facilitate  
 19 specified unlawful activity, shall be fined under this title or imprisoned for not more than 20 years, or  
 both. For the purposes of this paragraph . . . the term ‘represented’ means any representation made by a  
 law enforcement officer or by another person at the direction of, or with the approval of, a Federal  
 official authorized to investigate or prosecute violations of this section.”

20 **Title 18, United States Code, Section 1956(a)(1)(A) and (B)** provides:

21 “Whoever, knowing that the property involved in a financial transaction represents the proceeds of some  
 22 form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact  
 23 involves the proceeds of specified unlawful activity . . . with the intent to promote the carrying on of  
 24 specified unlawful activity; or . . . knowing that the transaction is designed in whole or in part . . . to  
 25 conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of  
 specified unlawful activity . . . shall be sentenced to a fine of not more than \$500,000 or twice the value  
 of the property involved in the transaction, whichever is greater, or imprisonment for not more than  
 twenty years, or both.”

26 ///

27 ///

28 ///

///

1 **Title 18, United States Code, Section 371** provides:

2 “If two or more persons conspire . . . to commit any offense against the United States . . . and one or  
3 more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title  
4 or imprisoned not more than five years, or both.”

5 **Title 18, United States Code, Section 2314** provides:

6 “Whoever transports, transmits, or transfers in interstate or foreign commerce any goods, wares,  
7 merchandise, securities or money, of the value of \$5,000 or more, knowing the same to have been  
8 stolen, converted or taken by fraud . . . shall be fined under this title or imprisoned not more than ten  
9 years, or both.”

10 **Title 18, United States Code, Section 2315** provides:

11 “Whoever receives, possesses, conceals, stores, barter, sells, or disposes of any goods, wares or  
12 merchandise, securities or money of the value of \$5,000 or more . . . which have crossed a State or  
13 United States boundary after being stolen, unlawfully converted, or taken, knowing the same to have  
14 been stolen, unlawfully converted, or taken . . . [s]hall be fined under this title or imprisoned not more  
15 than ten years, or both.”

16 **Title 21, United States Code, Section 841(a)(1)** provides:

17 “[I]t shall be unlawful for any person knowingly or intentionally to manufacture, distribute . . . or  
18 possess with intent to manufacture, [or] distribute . . . a controlled substance” and penalties depend on  
19 type and quantities of controlled substance.

20 **Title 21, United States Code, Section 846** provides:

21 “Any person who attempts or conspires to commit any offense defined in this subchapter shall be subject  
22 to the same penalties as those prescribed for the offense, the commission of which was the object of the  
23 attempt or conspiracy.”

24 **Title 18, United States Code, Section 922(a)(1)** provides:

25 “It shall be unlawful for any person except a licensed importer, licensed manufacturer, or licensed  
26 dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of  
27 such business to ship, transport, or receive any firearm in interstate or foreign commerce” and penalties  
28 are provided pursuant to 924(a)(1)(D) for willful violations of being “fined under this title, imprisoned  
not more than five years, or both.”

**Title 18, United States Code, Section 922(g)(1)** provides:

“It shall be unlawful for any person who has been convicted in any court of, a crime punishable by  
imprisonment for a term exceeding one year . . . to ship or transport in interstate or foreign commerce, or  
possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition  
which has been shipped or transported in interstate commerce.”

1 **Title 18, United States Code, Section 924(c)** provides:

2 “[A]ny person who, during and in relation to any crime of violence or drug trafficking crime . . . for  
3 which the person may be prosecuted in a court of the United States, uses or carries a firearm, or who, in  
4 furtherance of any such crime, possesses a firearm, shall, in addition to the punishment provided for  
5 such crime of violence or drug trafficking crime . . . be sentenced to a term of imprisonment of not less  
6 than 5 years . . . [and] no term of imprisonment imposed on a person under this subsection shall run  
7 concurrently with any other term of imprisonment imposed on the person, including any term of  
8 imprisonment imposed for the crime of violence or drug trafficking crime during which the firearm was  
9 used, carried, or possessed.”

10 **Title 18, United States Code, Section 2342(a)** provides:

11 “It shall be unlawful for any person knowingly to ship, transport, receive, possess, sell, distribute, or  
12 purchase contraband cigarettes.” Contraband cigarettes are defined as “a quantity in excess of 10,000  
13 cigarettes, which bear no evidence of the payment of applicable State or local cigarette taxes in the State  
14 or locality where such cigarettes are found, if the State or local government requires a stamp,  
15 impression, or other indication to be placed on packages or other containers of cigarettes to evidence  
16 payment of cigarette taxes, and which are in the possession of any person other than” a manufacturer or  
17 warehouse proprietor exempted from the law, a common carrier with a proper bill of lading, a person  
18 licensed and in compliance with the State, or a government employee. Section 2344 provides that  
19 “Whoever knowingly violates section 2342(a) of this title shall be fined under this title or imprisoned  
20 not more than five years, or both.” I am aware that New York law requires tax stamps affixed to  
21 cigarettes sold in New York.

22 **Title 18, United States Code, Section 1958** provides:

23 “Whoever travels in or causes another . . . to travel in interstate or foreign commerce, or uses or causes  
24 another . . . to use the mail or any facility of interstate or foreign commerce, with intent that a murder be  
25 committed in violation of the laws of any State or the United States as consideration for the receipt of, or  
26 as consideration for a promise or agreement to pay, anything of pecuniary value, or who conspired to do  
27 so, shall be fined under this title or imprisoned not more than ten years, or both . . . .”

28 **Title 18, United States Code, Section 922(l)** provides:

“[I]t shall be unlawful for any person knowingly to import or bring into the United States or any  
possession thereof any firearm or ammunition; and it shall be unlawful for any person knowingly to  
receive any firearm or ammunition which has been imported or brought into the United States or any  
possession thereof in violation of the provisions of this chapter.”

**Title 18, United States Code, Section 1343** provides:

“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining  
money or property by means of false or fraudulent pretenses, representations, or promises, transmits or  
causes to be transmitted by means of wire . . . communication in interstate or foreign commerce, any  
writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be  
fined under this title or imprisoned not more than 20 years, or both.” And Section 1346 provides: “For

1 the purposes of this chapter, the term 'scheme or artifice to defraud' includes a scheme or artifice to  
2 deprive another of the intangible right of honest services."

## 3 II. PROBABLE CAUSE

### 4 A. SUMMARY OF INVESTIGATION

5 At some point in the last five years, an undercover FBI agent (herein "UCE 4527") was  
6 introduced to a high-level member of the CKT. As a result of this introduction, in May 2010, another  
7 undercover FBI agent (herein "UCE 4599") was introduced to target subject Raymond CHOW. CHOW  
8 then introduced UCE 4599 to many of the target subjects, referenced in Section I of this Affidavit.

9 As FBI UCEs continued to infiltrate the CKT through introductions made by CHOW and NIEH,  
10 it became apparent that CHOW was in charge of a criminal element of the CKT, which will be referred  
11 to as the CHEE KUNG TONG CRIMINAL ENTERPRISE (herein CKTCE). In particular, during a  
12 meeting with UCE 4599, while seated in a booth in a karaoke bar, CHOW whispered into UCE 4599's  
13 ear that although CHOW was no longer involved in criminal activity, CHOW knew of and approved all  
14 criminal activities within his organization. Moreover, CHOW has described himself to UCE 4599 as a  
15 judge within his organization. According to CHOW, when there is a dispute between the organization's  
16 members and if one member kills another member, CHOW decides if the killing was justified. NIEH  
17 has explained to UCE 4599 that he, meaning NIEH, is also considered a leader within the organization,  
18 but that NIEH still reports to CHOW, whom NIEH described as the equivalent of a general. On another  
19 occasion, during a discussion between CHOW and NIEH in a court authorized T-III intercept, CHOW  
20 acknowledged that the activities between UCE 4599 and officials who hold positions in the CKT (YUN  
21 and PAU) can be interpreted as organized crime and that NIEH needed to take care when involving  
22 YUN in such activity [money laundering] because of her [YUN's] financial responsibilities and ties to  
23 the CKT and CHOW's company [believed to be CHOW ENTERPRISES, LLC]. Additionally, NIEH  
24 explained to UCE 4599 that CHOW has sacrificed himself by being a target of law enforcement and that  
25 has enabled other members of his organization to conduct criminal activity "freely" because law  
26  
27  
28

1 enforcement was focused on CHOW. From this investigation, activities of CHOW and members of the  
2 CKTCE show a pattern of racketeering activity.

3 During the course of multiple undercover operations, UCE 4599 was brought into a criminal  
4 relationship with many of the Targets. The purpose of this criminal relationship was for CHOW, NIEH,  
5 SIU, and CHIU to launder UCE 4599's money, purported by UCE 4599 to have been derived from  
6 illegal activities, specifically illegal gambling, bookmaking, sports betting, drugs, and outdoor marijuana  
7 grows. In further support of UCE 4599's legend, UCE 4599 portrayed himself to CHOW and others as  
8 an east coast member of La Cosa Nostra, an Italian organized crime syndicate. CHOW, as the  
9 Dragonhead of the CKT, was the supervisor of the criminal relationship with UCE 4599. In support,  
10 both NIEH and SIU and other Targets have stated to UCE 4599 that CHOW sanctioned them to engage  
11 in criminal activities with UCE 4599. Eventually, in March of 2012, UCE 4599 was inducted into the  
12 CKT at an event, and given the title of Consultant to the CKT.  
13

14 Through subsequent undercover operations, UCE 4599 conveyed to NIEH his interest in  
15 laundering money with other associates of NIEH and CHOW. NIEH then introduced YUN and PAU to  
16 UCE 4599 for the purpose of laundering money for UCE 4599. UCE 4599 explained to YUN and PAU  
17 the source of this money was from outdoor marijuana grows.  
18

19 From March 2011 through December 2013, CHOW, NIEH, SIU, CHIU, YUN and PAU  
20 collectively laundered \$2,290,000, in purportedly illicit funds, for UCE 4599. Specifically, NIEH  
21 laundered \$1,720,000, SIU laundered \$160,000, CHIU laundered \$170,000, YUN and PAU laundered a  
22 total of \$240,000. They were paid a 10% fee for laundering the money.  
23

24 As the criminal relationship continued to develop among UCE 4599, CHOW and the Targets,  
25 UCE 4599 advised that he was interested in generating income from any illegal schemes in which they  
26 are involved.

27 In response, NIEH, CHOW and UCE 4599 engaged in a scheme to transport stolen liquor to  
28

1 China. It was at that time, CHOW directly introduced TINA LIANG, who is an associate of TILTON  
2 and JANE LIANG. UCE 4599 subsequently conducted a purportedly stolen liquor transaction with  
3 TINA LIANG, TILTON and JANE LIANG, where they paid UCEs \$30,000 for purportedly stolen  
4 liquor. Later in the investigation, it was revealed that the purportedly stolen liquor was shipped to  
5 Vietnam in lieu of being shipped to China. CHOW and NIEH were each paid \$5,000 for facilitating this  
6 transaction.  
7

8 Subsequently, NIEH introduced MA and SO. SO owns a restaurant located in San Francisco  
9 where many of the CKT events have been held. UCE 4599 on two occasions sold purportedly stolen  
10 liquor to MA and SO totaling approximately \$14,500. CHOW and NIEH were both paid \$6,000 each  
11 for facilitating these purportedly stolen liquor transactions. MA was paid \$900 for his role.  
12

13 Through consultations with CHOW, NIEH continued to help UCE 4599 build his criminal  
14 relationships with members of the CKTCE. In particular, NIEH, YUN and PAU expressed interest in  
15 facilitating the sale of purportedly stolen cigarettes without proper tax stamps (contraband cigarettes) to  
16 CKTCE associates located in New York. In New York, on three occasions, UCEs sold in total 250  
17 master cases of cigarettes to YUN, PAU, CHAN and ZHANG, and others yet to be identified, for  
18 \$431,910.  
19

20 YUN and PAU profited \$36,010 from the purportedly stolen and contraband cigarette  
21 transactions. CHOW and NIEH received \$17,000 each as part of their profits.  
22

23 NIEH has also introduced UCE 4599 to CHANTHAVONG, for the purpose of allowing UCE  
24 4599 to assist CHANTHAVONG in a San Francisco-based marijuana trafficking operation that  
25 CHANTHAVONG operated. After furthering the relationship with CHANTHAVONG, UCE 4599 was  
26 introduced to CHANTHAVONG'S criminal associates LI, and NHINGSAVATH, who solicited UCE  
27 4599's help in laundering drug proceeds from the east coast to San Francisco. UCE 4599 purported that  
28 he and his criminal associates on the east coast would accommodate their request in exchange for a



1 money laundering fee. LI and NHINGSAVATH agreed, and later involved criminal associates  
2 MASTRANGELO and others, who facilitated multiple money laundering transactions by dropping off  
3 drug proceeds in the form of cash to FBI UCEs on the east coast.

4 From March 2011 to December 2013, CHANTHAVONG, LI, NHINGSAVATH,  
5 MASTRANGELO and others with the permission of CHOW, have money laundered drug proceeds with  
6 UCE 4599 totaling \$1,048,764. Additionally, both LI and CHANTHAVONG have sold multiple  
7 firearms illegally, as well providing as a ballistic vest to UCE 4599. LI and CHANTHAVONG have  
8 also provided processed marijuana to UCE 4599 in exchange for cash.

9  
10 In October 2012, local law enforcement conducted state search warrants at CHANTHAVONG's  
11 residence and a warehouse associated to CHANTHAVONG. At the residence, officers and federal  
12 agents seized 91 marijuana plants, a loaded firearm, and approximately 1.785 kilograms of cocaine (one  
13 pressed into a brick form), among other items. At the warehouse associated to CHANTHAVONG,  
14 officers and federal agents seized 496 marijuana plants and a press with wood form attachments which  
15 appeared to be used as a tool to press material into a brick shape. The press and wood forms had trace  
16 amounts of a white powdery substance that tested positive for cocaine.

17  
18 Through CHOW and NIEH, UCE 4599 was also introduced to MICHAEL MEI, another member  
19 of the CKTCE, who was involved in drug trafficking. In October 2012, local law enforcement  
20 conducted state search warrants at a location associated to MICHAEL MEI. At this location, officers  
21 and federal agents seized 803 marijuana plants, to include indicia from a vehicle located in the house,  
22 among other items. The indicia included a map of Northern California with a location circled that  
23 corresponds to 33 Woodland Avenue, Daly City, CA. MEI's insurance documents were also found in  
24 one of the vehicles at this indoor marijuana location and MEI later discussed this location with UCE  
25 4599.  
26

27 As UCE 4599 continued to purport his interest in seeking profits from criminal activity, CHOW  
28

1 and NIEH then introduced ELAINE LIANG who requested that UCE 4599 launder drug proceeds from  
2 the east coast to San Francisco, CA. ELAINE LIANG then introduced GEE who revealed to UCE 4599  
3 their extensive drug network that extends to Georgia, New York, and Massachusetts. UCE 4599  
4 purported that he and his criminal associates on the east coast would accommodate their request in  
5 exchange for a money laundering fee. ELAINE LIANG and SERGE GEE agreed and later introduced  
6 LAI, CHEN, and others, who facilitated money laundering transactions in cities located in Georgia, New  
7 Jersey and Massachusetts.  
8

9 From August 2013 to December 2013, ELAINE LIANG, GEE, LAI, CHEN and others, with the  
10 support of CHOW, have successfully laundered drug proceeds with UCE 4599 totaling \$1,557,085.

11 CHOW was paid approximately \$30,000 for facilitating these money laundering operations  
12 through his support as the leader of the CKTCE.  
13

14 CHOW also introduced KEITH JACKSON to UCE 4599. KEITH JACKSON is a Consultant to  
15 the CKT, similar to the position of UCE 4599 who was inducted into the CKT.

16 Since this introduction, KEITH JACKSON, BRANDON JACKSON and SULLIVAN have  
17 committed and conspired to commit several criminal schemes. In particular, UCE 4599 purported to  
18 KEITH JACKSON his need for a large amount of weapons to arm his purported associates who tended  
19 to marijuana grows located in northern California. KEITH JACKSON responded by stating his son,  
20 BRANDON JACKSON and his associate SULLIVAN would be able to accommodate his request.  
21 Subsequently, KEITH JACKSON, BRANDON JACKSON and SULLIVAN sold various types of  
22 firearms, and two ballistic vests, to UCE 4599 in parking lots located in San Francisco. Additionally,  
23 KEITH JACKSON, BRANDON JACKSON and SULLIVAN, have conspired to commit a purported  
24 murder for hire scheme requested by UCE 4599. On another occasion, SULLIVAN provided multiple  
25 fraudulent credit cards to UCE 4599 using a fictitious name provided by UCE 4599 to SULLIVAN.  
26 During the investigation, there have been multiple conversations with UCE 4599 about the details of the  
27  
28

1 drug operation of KEITH JACKSON, BRANDON JACKSON and SULLIVAN involving the interstate  
2 distribution of drugs. One particular conspiracy involved the purported sale of cocaine to KEITH  
3 JACKSON, BRANDON JACKSON and SULLIVAN, from UCE 4599's purported drug connection on  
4 the east coast.

5 The criminal relationship further developed between UCE 4599 and KEITH JACKSON,  
6 BRANDON JACKSON, SULLIVAN. BRANDON JACKSON then introduced one of his sources of  
7 supply for firearms, later identified as Rinn ROEUN.

8 ROEUN sold multiple firearms to UCE 4599 and, during a series of conversations, told UCE  
9 4599 he [ROEUN] was willing to commit murder for a fee at the request of UCE 4599.

10 In addition to his relationship with CHOW and the CKT, KEITH JACKSON is also a close  
11 associate of, and has a long-time relationship with, SENATOR YEE. KEITH JACKSON owns and  
12 runs a business called "Jackson Consultancy," a San Francisco based consulting firm. During the time  
13 frame from at least May 2011 through the present, KEITH JACKSON has been involved in raising  
14 campaign funds for SENATOR YEE. This includes raising funds for SENATOR YEE's campaign  
15 during SENATOR YEE's run in the San Francisco mayoral election held on November 8, 2011; to  
16 retire SENATOR YEE's debt from the mayoral campaign; and for SENATOR YEE's current campaign  
17 in the California Secretary of State election to be held in November 2014.

18 Starting in May 2011, and continuing for several months, KEITH JACKSON solicited UCE  
19 4599 to make contributions to SENATOR YEE's San Francisco mayoral campaign. These solicitations  
20 included asking UCE 4599 for donations in excess of the \$500 individual donation limit. UCE 4599  
21 declined to make any donations to SENATOR YEE, but introduced KEITH JACKSON and SENATOR  
22 YEE to a purported business associate, UCE 4773, another undercover FBI agent. KEITH JACKSON  
23 and SENATOR YEE then solicited UCE 4773 for campaign contributions, and UCE 4773 made at least  
24 one personal donation in the amount of \$5,000 to SENATOR YEE's mayoral campaign.

1 After SENATOR YEE lost the November 8, 2011 election, he had at least \$70,000 in debt from  
2 that campaign. The same \$500 limit on individual donations applied to donations to retire that debt.  
3 After losing the election, and in anticipation of the expiration of his term as State Senator in December  
4 2014, SENATOR YEE decided to run for election in the California Secretary of State race to be held in  
5 November 2014. In order to retire the mayoral debt before starting to raise funds for the Secretary of  
6 State campaign, beginning in early 2012 SENATOR YEE and KEITH JACKSON sought to raise  
7 money, and did raise money, in order to retire the mayoral campaign debt. This included soliciting  
8 UCE 4773 for additional donations and in the course of doing so, SENATOR YEE and KEITH  
9 JACKSON agreed that SENATOR YEE would perform certain official acts in exchange for the  
10 donations from UCE 4773.  
11

12 In connection with efforts to retire the mayoral campaign debt, SENATOR YEE and KEITH  
13 JACKSON agreed that SENATOR YEE would make a telephone call to a manager with the California  
14 Department of Public Health in support of a contract under consideration with UCE 4773's purported  
15 client, and would provide an official letter of support for the client, in exchange for a \$10,000 campaign  
16 donation. SENATOR YEE made the call on October 18, 2012 and provided the letter on or about  
17 January 13, 2013. On November 19, 2012, KEITH JACKSON accepted the \$10,000 cash donation  
18 from UCE 4599, who was paying KEITH JACKSON and SENATOR YEE the money on behalf of  
19 UCE 4773.  
20

21 In addition, over the course of 2012 and continuing to the present time, SENATOR YEE and  
22 KEITH JACKSON have raised money and campaign funds for Senator YEE's Secretary of State  
23 campaign by soliciting donations from UCE 4599 and another FBI undercover agent, UCE 4180. They  
24 agreed that in exchange for donations from UCE 4599 and UCE 4180, SENATOR YEE would perform  
25 certain official acts requested by UCE 4599 and UCE 4180.  
26

27 In connection with efforts to raise funds for the Secretary of State campaign, SENATOR YEE  
28

1 and KEITH JACKSON agreed to UCE 4599's request that SENATOR YEE provide an official State  
2 Senate proclamation honoring the CKT in exchange for a \$6,800 campaign donation, the maximum  
3 individual donation amount allowed by law. SENATOR YEE arranged to provide the proclamation  
4 and one of his staff members made the official presentation of the proclamation on SENATOR YEE's  
5 behalf at a CKT anniversary celebration on March 29, 2013. On May 6, 2013, UCE 4599 provided a  
6 \$5,000 check payable to "Leland Yee Secretary of State" to KEITH JACKSON; on July 11, 2013, UCE  
7 4599 provided a second check to KEITH JACKSON, this time for \$1,800, made payable to "Leland  
8 Yee Secretary of State."

10 Also as part of SENATOR YEE's and KEITH JACKSON's efforts to raise money for the  
11 Secretary of State race, SENATOR YEE and KEITH JACKSON agreed that in exchange for campaign  
12 donations, SENATOR YEE would introduce a donor to state legislators who had influence over  
13 pending and proposed medical marijuana legislation, an area in which the donor purportedly had  
14 significant business interests. The donor was another FBI undercover agent, UCE 4180, who was  
15 posing as a businessman involved in medical marijuana in Arizona and who wanted to expand his  
16 business interests to California. On June 20, 2013, SENATOR YEE made one such introduction and in  
17 payment for that introduction, UCE 4180 delivered \$11,000 cash to SENATOR YEE and KEITH  
18 JACKSON on June 22, 2013. On August 26, 2013, SENATOR YEE introduced UCE 4180 to another  
19 legislator, and on September 17, 2013, UCE 4180 gave SENATOR YEE and JACKSON \$10,000 in  
20 cash as payment for that introduction.

23 In a further attempt of KEITH JACKSON and SENATOR YEE to gain more money from UCE  
24 4599, in August 2013, KEITH JACKSON told UCE 4599 that SENATOR YEE, had a contact who  
25 deals in arms trafficking. This purported arms dealer was later identified. JACKSON requested UCE  
26 4599 to provide a campaign donation on behalf of SENATOR YEE, for SENATOR YEE to facilitate a  
27 meeting with the arms dealer with the intent of UCE 4599 to purportedly purchase a large number of  
28

1 weapons to be imported through the Port of Newark, New Jersey. During a meeting with UCE 4599,  
2 SENATOR YEE, and KEITH JACKSON, SENATOR YEE discussed certain details of the specific  
3 types of weapons UCE 4599 was interested in buying and importing.

4 It should be noted that throughout this investigation, CHOW has made several exculpatory  
5 statements about how he strives to become legitimate and no longer participates in criminal activity.

6 For example, CHOW has previously discussed how he had \$50,000 in his bank account that he  
7 set aside to get his book published. CHOW stressed that those funds were absolutely legitimate.  
8 Further into the conversation, CHOW stated that he now promoted "grand ideas." CHOW stated that  
9 law enforcement was looking to put CHOW away, and that there were "snitches" out there who were  
10 using CHOW to direct law enforcement attention onto CHOW. CHOW said that he did not care,  
11 because what was happening "out there" had nothing to do with him.  
12

13 As another example, CHOW stated that he had a potential book deal and movie proposition  
14 regarding his life. CHOW stated the deal was for \$3 million. CHOW said he did not want to sign the  
15 deal, because he wanted control of production of the story. CHOW added that community leaders from  
16 Sacramento asked CHOW to give lectures on the evils of alcohol and drugs, and that CHOW earned  
17 \$200 each time he gave such a lecture.  
18

19 In addition, during multiple meetings with UCE 4599, CHOW has repeatedly referred to  
20 "legitimate" business, including the possibility of publishing an autobiography and possibly producing a  
21 movie regarding his life.  
22

23 Similarly, in October of 2011, CHOW said that he was broke, but that people did not believe  
24 him. UCE 4599 responded that for a broke person, CHOW had a lot of nice clothes and jewelry.  
25 CHOW explained that he did not understand why people gave him things all the time.

26 In February of 2012, in regards to the transportation and sale of a shipment of stolen liquor,  
27 CHOW told UCE 4599 that he did not know that UCE 4599 did not have a liquor license. UCE 4599  
28



1 explained that he did not have a liquor license, and that the only license he had was to do whatever  
2 business he wanted to. CHOW explained he didn't want to know the details of the liquor deal and said  
3 that UCE 4599 and NIEH were outlaws. CHOW asked "How am I hanging out with outlaws like this?"  
4 NIEH pointed to CHOW and said "you are an outlaw too." CHOW laughed and replied "I'm innocent, I  
5 don't have no knowledge of the crimes you commit to pay for my meal, that is very bad." (However, it  
6 should be noted that CHOW continued to say, "I'm still eating though, I'm hungry." CHOW then asked  
7 NIEH, "What side are you on man, are you on the prosecutor's side or something?" NIEH explained  
8 that he was in the middle. CHOW replied "I'm good with the outlaw thing man.")

10 CHOW has also been portrayed in many Chinese newspapers as being involved in community  
11 affairs and has been photographed posing with local politicians and other community leaders. For  
12 example, in August of 2006, CHOW was photographed holding a Certificate of Honor from the San  
13 Francisco Board of Supervisors for community service of the CKT.

15 Nonetheless, while making these self-exculpatory statements and references to apparently  
16 legitimate business activity, CHOW also frequently makes inculpatory statements confirming his  
17 knowledge of and involvement in criminal activity, as further detailed below. CHOW's involvement in  
18 illegal activity is discussed in further detail below, but in sum, CHOW has repeatedly accepted  
19 payments from UCE 4599 as a fee for allowing UCE 4599 to engage in money laundering with NIEH,  
20 CHIU, SIU and others, and has told UCE 4599 that while he, CHOW, does not engage in criminal  
21 activity himself, he knows what is going on in his organization and approves of all criminal activity.  
22 Using his influence and position within the CKTCE, CHOW continued to sanction introductions and  
23 criminal activity between UCE 4599 and CHOW's associates and continued to receive payments from  
24 UCE 4599 for his involvement in facilitating those criminal activities. CHOW continued to introduce  
25 multiple individuals to UCE 4599. Early in the investigation, CHOW approached UCE 4599 and others  
26 about schemes to illegally ship what CHOW described as "military-grade" tungsten between the United  
27  
28

1 States and China. CHOW also helped to arrange a deal to sell and ship purportedly stolen liquor from  
2 the United States to China.

3 It should also be noted that in the course of the investigation, SENATOR YEE has made  
4 exculpatory statements about how he is not interested in making money for himself, and complaining  
5 about the way UCE 4180 openly discussed how much he was willing to pay SENATOR YEE for certain  
6 official acts. In terms of the latter, SENATOR YEE periodically complained to KEITH JACKSON and  
7 others that talk like that is "pay to play," and said that he could not do that. He also added that  
8 contributions could not be linked to any items, bills, or amendments.  
9

10 Despite complaining about UCE 4180's tendency to speak frankly and tie payment to  
11 performance, and threatening to cut off contact with UCE 4180, SENATOR YEE and KEITH  
12 JACKSON continued to deal with UCE 4180 and never walked away from quid pro quo requests made  
13 by UCE 4180. In fact, SENATOR YEE provided the introductions sought by UCE 4180 and accepted  
14 cash payments which UCE 4180 expressly tied to the making of the introductions.  
15

16 Below I describe in detail undercover operations involving UCE 4599 and Targets identified in  
17 Section I of this Affidavit, along with others that were recorded either using body wire recorders, closed  
18 circuit television (herein "CCTV"), or via court authorized T-III intercepts. Unless otherwise noted, the  
19 facts detailed below were recorded and/or observed by UCE 4599 and/or other UCEs during  
20 conversations and interactions with CHOW, YEE, and/or their associates.  
21

## 22 ***B. EARLY CONVERSATIONS WITH CHOW AND ASSOCIATES***

23 In some of the earliest meetings, CHOW discussed illegal activities and making introductions for  
24 the UCEs to commit illegal acts. CHOW stated that he could not be involved in committing any of the  
25 acts, but that he could make introductions. At the very first meeting between CHOW and UCE 4527,  
26 CHOW boasted that he could move hundreds of kilos of drugs if he wanted to, but that he did not.  
27  
28

1 On June 28, 2010, CHOW went on a chartered fishing boat with UCE 4527 and 4599 off of the  
2 North Shore of Oahu. During the boating trip, they discussed potential business. CHOW indicated that  
3 he could get "military grade" Tungsten from China for cheap. He was also interested in exporting high  
4 end alcohol (like Remy or Hennessey) to China through contacts. These offers were not followed up on  
5 by the UCEs.

6  
7 On July 23, 2010, UCE 4599 had dinner with CHOW and George NIEH. CHOW and NIEH  
8 discussed what types of guns they prefer. CHOW described how he used to carry two 9mm and a .45  
9 caliber. CHOW described that a .22 caliber is an assassin's gun, but he liked carrying something that  
10 had real power and would stop someone if you had to use it on the street. He described shootings and  
11 pistol whippings that he had done in the past.

12 On August 5, 2010, UCE 4599 was introduced by CHOW to Keith JACKSON and others.  
13 CHOW told UCE 4599 that JACKSON has a lot of political influence and can do "inside deals" with the  
14 City. CHOW explained that he met Keith JACKSON when JACKSON approached CHOW to try to get  
15 support for the development in the Bayview/Hunter's Point area of the City. Later that same night,  
16 CHOW asked UCE 4599 about distributing illegal diesel that CHOW stated he could get for "under  
17 market prices" from China.

18  
19 On December 16, 2010, UCE 4527 talked with CHOW. UCE 4527 vouched for UCE 4599 to do  
20 business with CHOW's people, like Kevin SIU. CHOW asked about what sort of business, and UCE  
21 4527 talked about illegal cigarette trafficking. CHOW warned against that business, since they were  
22 already doing so well. CHOW said he had turned down similar deals in the past.

23  
24 On February 10, 2011, SIU and UCE 4599 met in Las Vegas, Nevada. During that meeting, SIU  
25 stated that CHOW had approved for SIU to do business with UCE 4599. SIU and UCE 4599 discussed  
26 trafficking in marijuana and cocaine. SIU said that he wanted to make it clear that CHOW had nothing  
27 to do with their discussions about drug trafficking. UCE 4599 told SIU that he better take care of  
28

1 CHOW out of respect and SIU said "a deal is a deal." SIU said CHOW gave the okay to work with  
2 UCE 4599, but that CHOW had nothing to do with any illegal activities. SIU pulled out a gun and put it  
3 on the table while giving UCE 4599 a sample of cocaine to test. They discussed SIU laundering money  
4 for UCE 4599, for a 10% profit.

5 ***C. CONVERSATIONS REGARDING THE CKT AND HST***

6 Through his lengthy relationship with CHOW, NIEH, SIU, CHIU, and others, UCE 4599 has  
7 been exposed to many conversations regarding the conduct, organization, membership, and operation of  
8 the Chee Kung Tong (CKT) and the Hop Sing Tong (HST). Almost all of those conversations were  
9 recorded and are repeated throughout this memorandum. In March of 2012, UCE 4599 was also  
10 inducted into the CKT as a "Consultant" to the enterprise. He was, from that point on, further entrusted  
11 with conversations regarding the membership and conduct of the enterprise. UCE 4599 has also  
12 attended and recorded many CKT events, including their annual banquets. UCE 4599 also bribed  
13 California State SENATOR LELAND YEE and KEITH JACKSON to obtain a proclamation from the  
14 California Senate on behalf of the CKT. UCE 4599 was present at a CKT function when the  
15 proclamation was presented by one of SENATOR YEE's staff members.

16 CHOW has described himself, and been described by others, as the Dragonhead of the CKT. He  
17 uses the numeric title of "489." George NIEH has described himself as a soldier in the organization, but  
18 has also stated that he will not take an officer's role due to his active criminal activities. James PAU  
19 described his position within the CKT as an organizer, and the number "415." Leslie YUN also  
20 described herself, and was described by others, as a bookkeeper for the CKT. Kongphet "Joe"  
21 CHANTHAVONG described himself as the Head of Security. Andy LI described himself, and was  
22 described by others, as the head of enforcement for the CKT. Ming MA has described himself, and gave  
23 UCE 4599 a business card, showing his position as a soldier in the CKT. KEITH JACKSON was sworn  
24 into the CKT as a Consultant, the same position given to UCE 4599.

1 On March 19, 2011, the day following an annual CKT banquet, CHOW described to UCE 4599  
2 that the placing of a black lion outside of the banquet restaurant was to send a message of intimidation to  
3 all other organizations that CHOW's organization was the oldest and strongest.

4 On April 13, 2011, NIEH described his history and CHOW's history as gang leaders. NIEH said  
5 he was in charge of the Wah Ching gang and CHOW was in charge of the Hop Sing gang. NIEH said  
6 they used to be enemies, but banded together instead. CHOW described that he had nothing to prove as  
7 a tough guy any longer, but that if anything happened to him, the person who did it would pay a  
8 tremendous price and their life would disappear. CHOW said he always had a group to shadow him for  
9 protection. At one point while music was loud in a club, CHOW told UCE 4599 that while he, CHOW,  
10 does not engage in criminal activity himself, he knows what is going on in his organization and approves  
11 of all activity.  
12

13 On May 6, 2011, NIEH told UCE 4599 that he and CHOW believed that SIU was a rat and was  
14 cooperating with the police. NIEH stated that if they thought someone was a rat they would kill them or  
15 chop off their tail.  
16

17 On May 25, 2011, UCE 4599 went to dinner with CHOW, NIEH and KEITH JACKSON.  
18 CHOW spoke about his position as the Dragonhead and explained that if one of his members had an  
19 argument and killed another member, CHOW would act as a judge to see if the killing was justified, and  
20 then make a ruling. During dinner, KEITH JACKSON requested that UCE 4599 contribute \$500 to  
21 SENATOR YEE's campaign for Mayor of San Francisco. CHOW explained that SENATOR YEE only  
22 realizes now the influence CHOW has on the Chinese community. CHOW later stated that he helped  
23 SENATOR YEE enough already. NIEH explained that SENATOR YEE made a big mistake by not  
24 supporting CHOW on one occasion.  
25

26 On September 22, 2011, NIEH described CHOW as a member of the Triad and that he had to do  
27 everything "under the table." NIEH described himself as a gangster.  
28

1 On October 19, 2011, CHOW stated that he had not felt threatened in a long time. CHOW said  
2 he did feel threatened about five years earlier. CHOW said that the last time someone posed a threat to  
3 CHOW, CHOW "dropped him." CHOW also described his loyalty to his Dai Lo earlier in his career  
4 and compared CHANTHAVONG's current loyalty to CHOW. I am aware that "Dai Lo" is a term  
5 meaning "Big Brother." In the context of Asian organized crime, it is a term indicating a higher rank in  
6 the organization, or a boss, and is a term of respect.  
7

8 On November 17, 2011, NIEH described to UCE 4599 a run in at the HST headquarters between  
9 CHOW's people and people who supported a rival Hop Sing Tong member. NIEH told UCE 4599 that  
10 NIEH and CHANTHAVONG were positioned outside of the headquarters and carrying firearms to  
11 protect CHOW. When they saw SFPD officers at the event, they then hid their guns across the street in  
12 a restaurant bathroom. Later that night, CHOW described to UCE 4599 the animosity between himself  
13 and the rival and that CHOW was removing his protection from that rival so that the rival could be  
14 killed by anyone. CHOW said that he received a call after the HST meeting from a supposed follower  
15 of his rival, who told CHOW that his rival was not the real Dai Lo; CHOW was the real Dai Lo.  
16

17 On January 18, 2012, while traveling in Las Vegas, NIEH told UCE 4599 that he stabbed a man  
18 in Hong Kong in order to gain admission into the gang. NIEH also told UCE 4599 that CHOW was  
19 considering leaving the HST in an effort to determine who CHOW's real allies were. NIEH told UCE  
20 4599 that he would be sworn into the CKT on March 16, 2012, at the annual CKT dinner event. NIEH  
21 said that he and CHOW would show up to the event late to avoid any potential encounters with law  
22 enforcement. NIEH told UCE 4599 that CHOW had asked for a favor – CHOW wanted to know if UCE  
23 4599 would ask UCE 4773 to ask SENATOR YEE to assist in removing CHOW's ankle monitor.  
24 NIEH described the history of the Chinese Tongs.  
25

26 On January 25, 2012, CHOW discussed how the U.S. Department of Justice is waiting for him to  
27 slip up so that they can charge him, but that it will not work because CHOW knows what they are doing.  
28



1 CHANTHAVONG later talked to UCE 4599 and explained that Andrew LI, a/k/a Andy LI, is a little  
2 higher than CHANTHAVONG in the CKT. CHANTHAVONG described CHOW as the boss of LI and  
3 CHANTHAVONG. CHANTHAVONG said he had five people hand-picked under him.  
4 CHANTHAVONG said that when CHOW was elected Dragonhead, he made CHANTHAVONG his  
5 personal security. Later that night, CHOW described to UCE 4599 that, although he was not involved in  
6 any criminal activity, he had some pretty rough people in the city if he needed them. CHOW described  
7 that he was aware of what was happening in the streets and if his members have problems with each  
8 other, then CHOW mediates. CHOW said members come to him to discuss his opinions on how to  
9 handle situations. In a discussion with LI, LI told UCE 4599 that he came back to the Bay Area to  
10 handle CHOW's problems with his rival in the HST. LI said that he would pretend that there was a  
11 falling out between LI and CHOW so that he could get close to CHOW's rival and then "get rid of the  
12 bugs."  
13 bugs."

14  
15 On February 16, 2012, CHOW discussed with UCE 4599 that CKT members from New York  
16 would be attending the March 2012 CKT event in San Francisco. CHOW said the New York members  
17 were asking CHOW for promotions. CHOW said each had to explain to CHOW what they had done in  
18 the past three years that would get them a promotion. CHOW said the New York members needed to  
19 "earn their stripes." CHOW explained that the CKT in San Francisco is the original CKT in the United  
20 States.  
21

22 On March 16, 2012, UCE 4599 attended an annual event sponsored by the CKT. During that  
23 event, UCE 4599 and KEITH JACKSON were both inducted into the CKT as Consultants. CHOW  
24 presented UCE 4599 with a certificate signifying his role in the CKT as Consultant. CHANTHAVONG  
25 was there and said that "when Old Man [CHOW] says you are family, then you are family."  
26 CHANTHAVONG said that if UCE 4599 ever needed anything, CHANTHAVONG would have his  
27 "guys take care of it." CHANTHAVONG described that he had five guys who were a "Black  
28

1 Operations Team” that swore loyalty to CHANTHAVONG only but that CHANTHAVONG’s loyalty is  
2 to CHOW. CHANTHAVONG described getting into fights and talked about selling guns to UCE 4599.  
3 CHANTHAVONG said it would be hard to get UCE 4599 a “clean” gun and he didn’t want to supply  
4 one with “four or five bodies on it.”

5 On April 19, 2012, NIEH described that they should stop working on money laundering deals  
6 with Alan CHIU since CHIU was dropping out of the CKT. NIEH said that “if we are not together then  
7 I don’t trust you.” NIEH said he was seeking CHOW’s authority to prevent CHIU from working with  
8 UCE 4599 since CHIU would not be CKT any longer.

9 On April 20, 2012, CHOW described to UCE 4599 that if he ever got “hit,” there would be a lot  
10 of people to avenge his death.

11 On May 3, 2012, NIEH, James PAU and Leslie YUN described that they needed CHOW’s  
12 authorization to work with UCE 4599 on laundering money. PAU described how he had left the CKT  
13 and then re-joined the organization after 10 years.

14 On May 6, 2012, CHOW and NIEH talked with a recording device in NIEH’s vehicle,  
15 authorized by Court Order. CHOW described the need for YUN and PAU to be very careful when  
16 working with UCE 4599. CHOW described that everyone close to CHOW had an official position in  
17 the CKT. CHOW described that even if CHOW didn’t do anything, he and the CKT would be stuck at  
18 the end and dragged into it because of the CKT relationship. CHOW said that was why he didn’t want  
19 the officials close to him doing any of this stuff. CHOW said he was afraid of the CKT being tagged as  
20 an “underworld society” and “participating in organized crime.” CHOW said whenever members of the  
21 CKT get together they would be “participating in organized crime.” CHOW said that’s all he was  
22 worried about, but, of course, he wanted to make money. CHOW said he didn’t want the CKT involved.  
23 NIEH pointed out that SIU and CHIU were already working on it [laundering money with UCE 4599].  
24 CHOW said that those two didn’t hold important positions, but YUN is in charge of the CKT bank  
25  
26  
27  
28

1 accounts and holds the books. CHOW said law enforcement would try to press YUN to get to CHOW.  
2 CHOW said people who "rat" on him would be safe in the end and that CHIU was someone who would  
3 "rat" anyone out. CHOW said that if he got ratted out, he would claim that he had only introduced the  
4 relationship, and that he did not know what they were doing. CHOW said even if he knew what they  
5 were doing, he never witnessed the transactions. CHOW said he would claim that he knew those people  
6 talked to each other, that's all. CHOW said that is why CHOW says not to tell CHOW anything when  
7 giving a report of what is happening. CHOW did not want to know anything because he would not be  
8 guilty if he did not know anything. NIEH said he told UCE 4599 not to say too much on the phone also.  
9 CHOW said his associates made that mistake by using phones and that was what got them in trouble.  
10

11 On July 19, 2012, NIEH and UCE 4599 talked about the CKT. NIEH said because he had a  
12 criminal history, he couldn't take a position with the CKT or else law enforcement could classify the  
13 CKT as a "mafia" organization. UCE 4599 asked why that didn't keep CHOW from taking an official  
14 position. NIEH said that if NIEH would stop committing crimes then he could take a position. NIEH  
15 said the Hung Moon is a criminal organization in China, but not in the United States. UCE 4599 said it  
16 walks a fine line between legitimate and illegitimate and NIEH agreed.  
17

18 On July 26, 2012, UCE 4599 talked to NIEH and said whatever crimes he committed with the  
19 CKT, he would take care of CHOW and NIEH. NIEH told UCE 4599 to be careful talking with CHOW  
20 openly about criminal activities because CHOW was afraid of being overheard by law enforcement.  
21 NIEH said CHOW did not know about the stolen cigarette deals with YUN. UCE 4599 disagreed that  
22 CHOW did not know since NIEH had previously told CHOW that UCE 4599 "rips off trucks." UCE  
23 4599 agreed to try to keep CHOW out of conversations. NIEH said that CHOW serves a purpose by  
24 attracting attention from law enforcement and allowing everyone else to commit crimes. NIEH said he  
25 pays half of what he makes to CHOW.  
26

27 On September 7, 2012, UCE 4599 talked with NIEH about a disagreement between CHOW and  
28

1 YUN over a CKT event. YUN thought CHOW needed to treat people better. YUN also accused NIEH  
2 of only hanging around CHOW, but not helping to run the CKT. NIEH explained how hard it was to  
3 hang out with CHOW and that NIEH could take a bullet at any time protecting CHOW. NIEH told UCE  
4 4599 that CHOW had summoned "gangsters" of the CKT to help run the event.

5  
6 On September 8, 2012, UCE 4599 attended the CKT event in a restaurant in San Francisco  
7 Chinatown. At the dinner, UCE 4599 saw CHOW, NIEH, YUN, MA, PAU, MEI, and SIU. UCE 4599  
8 sat at a table with KEITH JACKSON and his son, BRANDON JACKSON. UCE 4599 agreed to meet  
9 with the JACKSONS regarding sale and transportation of narcotics.

10 On September 20, 2012, UCE 4599 talked to NIEH about whether another individual was a  
11 Triad member. The other person was interested in paying UCE 4599 to smuggle bulk cash from Canada  
12 into the United States. NIEH said he could "smell a Triad." NIEH showed UCE 4599 the Triad hand  
13 shake. UCE 4599 said he had seen CHOW do that same hand shake with certain people. NIEH  
14 confirmed that CHOW's Triad number was "489" and that all Triad ranks have a corresponding number.  
15 As UCE 4599 was negotiating with the other person, NIEH explained that the other person could trust  
16 UCE 4599 to transport large sums of money because "our Tong [the CKT] will be the middle person to  
17 watch out for both sides," meaning that the CKT would insure the transaction. NIEH said about NIEH  
18 and UCE 4599, "we know each other because of the Tong."

19  
20 On January 10, 2013, PAU described the following: PAU said CHOW's position as Dragonhead  
21 was a lifetime position. PAU said CHOW would work on his book and take care of "family business  
22 and community business." PAU said "we do all the work for him." PAU explained it was CHOW's  
23 responsibility to support his people when they conducted illegal business. UCE 4599 described how in a  
24 prior cigarette deal, UCE 4599 and his people could have easily robbed the people buying the cigarettes.  
25 PAU said his associates trusted UCE 4599 because his associates trusted CHOW. PAU said "they trust  
26 Dai Lo, that's why he's worth so much, that's why he don't have to do nothing." PAU told the UCE he  
27  
28

1 and CHOW were recruited into the HST together. PAU explained everyone within the HST had a role  
2 and responsibility within their organization. PAU talked about the importance of having a good Dai Lo.  
3 PAU and CHOW's original Dai Lo within the HST allowed CHOW and PAU to engage in as much  
4 criminal activity as they could handle. When they were successful, they were promoted and were given  
5 a "crew." PAU talked about CHOW's rise to power as the Dragonhead of the CKT. PAU told the  
6 UCE that CHOW's predecessor as the head of the CKT, Allen Leung, was murdered and CHOW  
7 stepped up to be the new leader of the CKT. UCE 4599 told PAU from what he heard on the street,  
8 Leung deserved to be murdered. PAU smiled and said "no comment." PAU showed UCE-4599 the  
9 official handshake for members of Triad Societies. PAU explained known members of Triad Societies  
10 in Hong Kong could be imprisoned for up to three years because of their affiliation with the Triad. PAU  
11 told the UCE, CHOW's official number within the Triad was "489." PAU explained his number within  
12 the Triad was "415". PAU demonstrated the hand sign for "415" and explained his duties within the  
13 Triad were focused on planning and gathering resources. For example, if CHOW asked for the  
14 assistance of 30 soldiers within the CKT, PAU would be responsible for recruiting the help needed for  
15 the operation. An individual classified as number "49" within the Triad was considered an ordinary or  
16 basic member. PAU stated that he believed the FBI had opened many organized crime cases against  
17 Triad members over the years. Since that time, many secrets of the Triad Societies have been revealed.  
18 PAU explained there are a legitimate side and an illegitimate side of the CKT. The legitimate side of the  
19 CKT focused on serving the Chinese community and its members. The illegitimate side of the CKT  
20 focused on illegal activities that made the CKT and its members money. PAU believed Italian  
21 organized crime families only had an illegitimate side.  
22

23 On January 19, 2013, NIEH and CHOW had a telephone call that was intercepted pursuant to  
24 Court Order. During the call, CHOW referenced giving others, including CHIU, directions and kicking  
25 people out of the "Association," demonstrating CHOW's control over others. They also discussed a  
26  
27  
28

1 recent trip that NIEH took to Las Vegas where he met with an associate of UCE 4599, another UCE,  
2 who posed as a member of the entertainment industry who also laundered money for UCE 4599.

3 On January 19, 2013, NIEH had a conversation in his car with another person, intercepted  
4 pursuant to Court Order. During the conversation, NIEH related that CHOW was upset about  
5 management issues in both the CKT and HST.  
6

7 On March 29, 2013, UCE 4599 attended an annual CKT dinner event. Present at the event were  
8 CHOW, YUN, LI, Albert NHINGSAVATH, NIEH, CHANTHAVONG, KEITH JACKSON, Michael  
9 MEI, PAU, BRANDON JACKSON, and Marlon SULLIVAN. A representative for SENATOR YEE  
10 attended and presented a Senate proclamation to recognize the CKT. CHANTHAVONG told UCE  
11 4599 that LI was the new "enforcer" for the CKT. LI discussed different ways to kill people and  
12 described that he had a crew of people. LI discussed that CHOW had taught him to keep people you  
13 wanted to kill close to you. CHANTHAVONG told UCE 4599 that if he ever needed someone taken  
14 care of, that CHANTHAVONG had "niggas that can take you out from 500-1000 yards."  
15

16 On April 17, 2013, CHOW discussed with NIEH and UCE 4599 how people used to be able to  
17 get away with a lot more crimes because law enforcement did not have the same sophisticated  
18 techniques as they have now. CHOW explained that there were a lot of smaller criminal crews in the  
19 Bay Area with their own leaders. CHOW described that he was not the leader of these smaller crews,  
20 but when CHOW "calls them out" they all come out to support CHOW. CHOW said "if anyone fucks  
21 with me, they are done for." CHOW told UCE 4599 that if UCE 4599 had any issues with any of  
22 CHOW's associates, UCE 4599 should let CHOW know.  
23

24 On July 18, 2013, UCE 4599 met with YUN and PAU in Flushing, New York. PAU reiterated  
25 that his position in the CKT was "415," the "white paper fan." PAU said that YUN was the bookkeeper  
26 for the Tong. PAU described that NIEH and CHANTHAVONG were responsible to protect CHOW. LI  
27 was "426" within the Tong, which made him a fighter, and made the shape of a gun with his hand. PAU  
28



1 said that he, PAU, would be responsible for making the call on a hit and LI would be responsible for  
2 carrying it out. PAU said that CHOW encouraged them to grow their illegal business by working with  
3 cultures outside of the Chinese community. PAU said that LI works directly with CHOW.

4 On August 11, 2013, NIEH and UCE 4599 discussed doing business with the 14K Triad. NIEH  
5 told UCE 4599 to be careful and said the 14K and the CKT were very similar in the sense that they were  
6 both Triad organizations. NIEH further described that he told CHOW about every illegal business  
7 opportunity that UCE 4599 had conducted with NIEH. NIEH said CHOW wanted to know and engaged  
8 by making calls on behalf of UCE 4599. UCE 4599 said that CHOW, as Dragonhead, needed to know  
9 what was going on, but be protected from law enforcement. NIEH said "exactly, clean his image."

11 ***D. CRIMINAL ACTS COMMITTED BY THE TARGETS***

12 In late February 2011, both SIU and NIEH discussed laundering money for UCE 4599, for 10%  
13 profit. UCE 4599 described to SIU and to NIEH that his money on the West Coast came from illegal  
14 gambling and from marijuana trafficking.

15 On February 24, 2011, UCE 4599 had dinner with CHOW, SIU, and NIEH. SIU picked UCE  
16 4599 up and told UCE 4599 that he was setting up a fictitious Limited Liability Company (LLC)  
17 through which he could launder UCE 4599's money, up to \$50,000 per month. SIU also volunteered to  
18 make collections of money for UCE 4599. During dinner, at a point, SIU and CHOW got up to go to the  
19 bathroom, leaving NIEH and UCE 4599 at the table. NIEH told UCE 4599 that, if they had  
20 opportunities to work together, that would help out CHOW. Later, at a bar, NIEH told UCE 4599 that  
21 NIEH would be willing to launder money for UCE 4599. NIEH said that CHOW gave NIEH  
22 instructions to work with UCE 4599. NIEH said he would take care of CHOW and kick some of the  
23 profits from laundering money up to CHOW.

24 During a dinner banquet for the CKT on March 18, 2011, NIEH said that he would kick up a  
25 portion of his fees for money laundering to CHOW, because CHOW was the "Big Brother" and had to  
26  
27  
28

1 be taken care of. UCE 4599 told NIEH that he had an envelope for CHOW for giving him the  
2 opportunity to work together. Immediately following that dinner, UCE 4599 gave an envelope with  
3 \$1000 cash to CHOW and told CHOW that it was for the opportunity to work with NIEH and SIU.  
4 CHOW took the envelope and hugged UCE 4599 and told him that he loved him. CHOW said that all  
5 of his brothers would take a bullet for CHOW. UCE 4599 told CHOW that he would take a bullet for  
6 CHOW as well.  
7

8 On March 19, 2011, UCE 4599 conducted a reverse money laundering deal with both NIEH and  
9 SIU for \$20,000 each. A reverse money laundering deal is a phrase referring to the targets "laundering"  
10 money, that is conducting a financial transaction with funds that a UCE represents to the targets is  
11 proceeds of specified unlawful activity – here, gambling and narcotics trafficking – with the intent to  
12 conceal or disguise the true nature, source and ownership of the funds and/or to promote the carrying on  
13 of the underlying specified criminal activity. Such an act violates Title 18 United States Code, Section  
14 1956(a)(3)(A) and (B).  
15

16 On March 19, 2011, each NIEH and SIU were paid \$2,000 for conducting the transactions (10%  
17 of the amount laundered). UCE 4599 gave NIEH \$2,000 in cash as a fee, and then gave NIEH \$20,000  
18 more in cash to be laundered. In exchange, NIEH wrote a personal check made payable to a fictitious  
19 business account for UCE 4599 in the amount of \$20,000 and postdated the check. The check was  
20 written on an account at East West Bank, a financial institution under Title 18, United States Code,  
21 Section 1956(c)(6). NIEH told UCE 4599 that he would set up a fictitious company to conduct future  
22 money laundering transactions. Separately on that same date, UCE 4599 met with SIU. UCE 4599 gave  
23 SIU \$2,000 in cash as payment. UCE 4599 then gave SIU \$20,000 in cash and an extra \$400 cash to  
24 cover SIU having to set up a fictitious company. SIU explained that he would do a series of deposits  
25 with the cash, and then return UCE 4599's money within five days. On March 25, 2011, the check from  
26 NIEH was successfully deposited into UCE 4599's fictitious account and on March 28, 2011, \$20,000  
27  
28

1 was wire transferred into UCE 4599's fictitious account from an account in the name of Dynamic  
2 Investment Consultant Company. The sole proprietor of Dynamic Investment Consultant Company is  
3 SIU.

4 On March 29, 2011, UCE 4599 discussed money laundering with NIEH and NIEH encouraged  
5 UCE 4599 to keep giving CHOW money as tribute for allowing them to work together. NIEH said he  
6 also would kick money up to CHOW as things progressed and that CHOW knew what the money was  
7 for.  
8

9 On April 12, 2011, UCE 4599 conducted a reverse money laundering deal with SIU for \$40,000  
10 and paid SIU \$4,000 for conducting the transaction. On April 12, 2011, UCE 4599 paid SIU \$44,000 in  
11 cash. On April 25, 2011, SIU sent a \$40,000 wire transfer from a Bank of America account for a  
12 fictitious LLC set up by SIU – Dynamic Investments – to UCE 4599's fictitious business account. I  
13 **believe this demonstrates probable cause for a violation of Title 18, United States Code, Section**  
14 **1956(a)(3)(A) and (B) by SIU.**  
15

16 On April 13, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for  
17 \$40,000 and paid NIEH \$4,000 for conducting the transaction. NIEH told UCE 4599 that NIEH had set  
18 up a fictitious company for the purpose of laundering UCE 4599's money and that had cost him \$495.  
19 UCE 4599 gave NIEH another \$500 cash to cover the expense. NIEH told UCE 4599 that the company  
20 he set up was called G&S Consulting Company. NIEH wrote three separate checks to UCE 4599's  
21 fictitious company, two for \$15,000 and one for \$10,000. All three checks were from an account with  
22 East West Bank. On April 20, 2011, the three checks were deposited into the account of UCE 4599's  
23 fictitious bank account and cleared. **I believe this demonstrates probable cause for a violation of**  
24 **Title 18, United States Code, Section 1956(a)(3)(A) and (B) by NIEH.**  
25

26 On May 4, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for \$60,000  
27 and paid NIEH \$6,000 for conducting the transaction.  
28

1 On May 25, 2011, UCE 4599 paid CHOW \$1,000 for allowing him to work with NIEH and SIU.  
2 Specifically, UCE 4599 said that things were good between NIEH and UCE 4599 and handed CHOW a  
3 white envelope with cash. CHOW immediately placed the envelope in the pocket of his sport coat, then  
4 told UCE 4599, "no no no, you guys don't have to do that." CHOW then hugged UCE 4599. UCE 4599  
5 repeated that everything was good. CHOW asked, "what do you guys have going? It must be  
6 something bad." CHOW looked at NIEH; NIEH nodded affirmatively.  
7

8 On May 26, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for  
9 \$110,000 and paid NIEH \$11,000 for conducting the transaction. On the same date, UCE 4599  
10 conducted a reverse money laundering deal with SIU for \$50,000 and paid SIU \$5,000 for conducting  
11 the transaction.  
12

13 On June 16, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for  
14 \$110,000 and paid NIEH \$11,000 for conducting the transaction. On the same date, UCE 4599  
15 conducted a reverse money laundering deal with SIU for \$60,000 and paid SIU \$6,000 for conducting  
16 the transaction.  
17

18 On July 14, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for  
19 \$120,000 and paid NIEH \$12,000 for conducting the transaction. UCE 4599 reiterated that the source of  
20 the money was gambling and marijuana trafficking. UCE 4599 gave NIEH \$132,000 in cash. NIEH  
21 counted the money and UCE 4599 stated that \$12,000 was the fee for laundering. NIEH provided UCE  
22 4599 with four postdated \$30,000 checks made out to UCE 4599's fictitious business account. Two of  
23 the checks were from a Bank of America account and did not have a name of an account holder. Two of  
24 the checks were from an East West Bank account, in the name of George NIEH and another person. On  
25 July 22, 2011, checks provided to UCE 4599 by NIEH were deposited into UCE 4599's fictitious  
26 business account and subsequently cleared for deposit. Following the transaction, UCE paid CHOW  
27 \$1,000 for allowing him to work with NIEH. UCE 4599 gave CHOW an envelope containing \$1,000 in  
28

1 cash. CHOW immediately said "no, no, no," but opened his sports coat to reveal an inside pocket. UCE  
2 4599 placed the envelope in the inside pocket of CHOW's sports coat. CHOW then hugged UCE 4599.

3 **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections**  
4 **1956(a)(3)(A) and (B) and 2 by NIEH and CHOW.**

5 Also on July 14, 2011, NIEH told UCE 4599 that CHOW preferred that UCE 4599 work with  
6 Alan CHIU to conduct future deals, not with SIU any longer, as they were concerned that SIU was a  
7 "rat." UCE 4599 met with CHIU and described that his money comes from gambling and marijuana  
8 transactions. CHIU agreed to launder money for UCE 4599.  
9

10 On August 1, 2011, UCE 4599 conducted a reverse money laundering deal with CHIU for  
11 \$30,000 and paid CHIU \$3,000 for conducting the transaction. UCE 4599 provided CHIU with \$33,000  
12 cash and advised CHIU that \$3,000 was CHIU's fee for laundering the money. CHIU wrote out four  
13 checks totaling \$30,000 from a Bank of the West account held by Alan CHIU and one other person to  
14 UCE 4599's fictitious business account. On the same date, UCE 4599 conducted a reverse money  
15 laundering deal with NIEH for \$100,000 and paid NIEH \$10,000 for conducting the transaction. On the  
16 same date, UCE 4599 paid CHOW \$2,000 for allowing him to work with CHOW's people. CHOW  
17 stated "no, no, no" but took the envelope of cash and placed it in his sports jacket pocket. On August 5,  
18 2011, three of the checks written by CHIU were deposited into UCE 4599's fictitious business account  
19 and subsequently cleared for deposit. On August 17, 2011, the last check from CHIU for \$6,000 was  
20 deposited and subsequently cleared. **I believe this demonstrates probable cause for a violation of**  
21 **Title 18, United States Code, Section 1956(a)(3)(A) and (B) and 2 by CHIU and CHOW.**  
22

23 On September 22, 2011, UCE 4599 conducted reverse money laundering deals with NIEH and  
24 CHIU. The deal with NIEH was for \$120,000 and UCE 4599 paid NIEH \$12,000 for conducting the  
25 transaction. The deal with CHIU was for \$60,000 and UCE 4599 paid CHIU \$6,000 for the transaction.  
26 On the same date, UCE 4599 paid CHOW \$2,000 for allowing him to work with NIEH and CHIU.  
27  
28

1 UCE 4599 provided CHOW with an envelope that contained \$2,000. CHOW placed the cash on the  
2 inside pocket of his sports coat and thanked UCE 4599.

3 On October 19, 2011, UCE 4599 conducted reverse money laundering deals with NIEH and  
4 CHIU. The deal with NIEH was for \$120,000 and UCE 4599 paid NIEH \$12,000 for conducting the  
5 transaction. The deal with CHIU was for \$40,000 and UCE 4599 paid CHIU \$4,000 for the transaction.  
6

7 On November 17, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for  
8 \$80,000 and paid NIEH \$8,000 for conducting the transaction. On the same date, UCE 4599 paid  
9 CHOW \$2,000 for allowing UCE 4599 to work with NIEH and CHIU. UCE 4599 handed CHOW an  
10 envelope containing \$2,000. CHOW put the money on the inside pocket of his coat. UCE 4599  
11 explained everything was going well for UCE 4599 and NIEH, and thanked CHOW. CHOW hugged  
12 UCE 4599. CHOW then said that NIEH was a really loyal brother.  
13

14 On December 13, 2011, UCE conducted reverse money laundering deals with NIEH and CHIU.  
15 The deal with NIEH was for \$80,000 and UCE 4599 paid NIEH \$8,000 for conducting the transaction.  
16 The deal with CHIU was for \$20,000 and UCE 4599 paid CHIU \$2,000 for conducting the transaction.  
17 On the same date, UCE 4599 paid CHOW \$2,000 for allowing UCE 4599 to work with NIEH and  
18 CHIU. UCE 4599 handed a white envelope containing \$2,000 to CHOW and thanked CHOW for the  
19 opportunity to work with NIEH and CHIU. During dinner, CHOW inquired about UCE 4599's ability  
20 to get large amounts of liquor, referring to UCE 4599 previously stating that he could get liquor cheap as  
21 it was stolen. CHOW had a call with an unknown individual and asked if that other person wanted a  
22 container of Hennessey.  
23

24 On January 23, 2012, UCE 4599 discussed CHOW setting up buyers of purportedly stolen  
25 alcohol with NIEH and then with CHOW. NIEH said that CHOW had made the introductions. CHOW  
26 explained that Tina [later identified as Tina LIANG] was lining up buyers in China.  
27  
28



1 On January 25, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for  
2 \$70,000 and paid NIEH \$7,000 for conducting the transaction. UCE 4599 discussed the potential liquor  
3 deal with NIEH. NIEH said CHOW wanted to know if UCE 4599 had given a quote for the liquor to  
4 TINA LIANG. UCE 4599 explained that the liquor was "hot," meaning stolen. NIEH said CHOW did  
5 not want any money from the liquor deal. UCE 4599 said CHOW always says that until he gets the  
6 money. NIEH laughed and said that when CHOW sees the money, it is different. NIEH and UCE 4599  
7 went to examine a warehouse where CHANTHAVONG was getting ready to set up a marijuana grow.  
8 On the same date, UCE 4599 paid CHOW \$2,000 for allowing UCE 4599 to work with NIEH and  
9 others. During a car ride to the Starlight Room, a nightclub in San Francisco, with CHOW and NIEH,  
10 UCE 4599 gave CHOW an envelope containing \$2,000. UCE 4599 told CHOW that NIEH and UCE  
11 4599 had a good year and thanked CHOW for the opportunity to work with NIEH. CHOW said thank  
12 you and that he knew NIEH and UCE 4599 had a good year. CHOW jokingly advised the UCE that  
13 NIEH is trouble maker. NIEH explained he was a "silencer" and he doesn't talk about business. UCE  
14 4599 concurred and explained he is loyal to NIEH and CHOW and thanked CHOW again for the  
15 opportunity to work with NIEH. CHOW said he loved the UCE.

18 On February 2, 2012, CHOW, NIEH and UCE 4599 met for lunch. UCE 4599 told CHOW he  
19 had talked to Jane LIANG about selling purportedly stolen liquor. UCE 4599 expressed displeasure  
20 with how Jane LIANG negotiated. CHOW told UCE 4599 he should talk with Jane LIANG because  
21 Tina LIANG was in China and wanted Jane LIANG to follow up. UCE 4599 said he was not a liquor  
22 store and that they needed to have the money up front. NIEH said the LIANGs should know better than  
23 that, and if they wanted to get liquor legally, they should go to the liquor store. CHOW said "I don't  
24 need to know all this, you guys trouble, nothing but trouble makers." UCE 4599 said he would try to  
25 keep CHOW out of the deal as much as possible. CHOW said Tina LIANG needed to know the price  
26 since she was setting up buyers in China. CHOW told UCE 4599 he didn't know UCE 4599 didn't have  
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1 a liquor license and laughed. UCE 4599 said the only license he needed was to do what he wanted.  
2 CHOW said he didn't want to know details and that UCE 4599 and NIEH were outlaws. NIEH said to  
3 CHOW "you are an outlaw too." CHOW said "I'm innocent. I don't have no knowledge of the crimes  
4 you commit to pay for my meal, that is very bad. But I'm still eating though, I'm hungry." CHOW said  
5 to NIEH "are you on the prosecutor's side or something?" CHOW said "I'm good with the outlaw thing  
6 man."  
7

8 On February 6, 2012, UCE 4599 and NIEH met with TINA LIANG. UCE 4599 told Tina  
9 LIANG that the liquor he had "fell off a truck," meaning it was stolen. TINA LIANG said she  
10 understood. UCE 4599 said he could sell it for \$100 per bottle, including his costs for transporting it to  
11 California from New Jersey. TINA LIANG asked what other goods UCE 4599 could get. UCE 4599  
12 told her it depended on what "fell off the truck." TINA LIANG said she understood. After they left,  
13 JANE LIANG called to discuss the name of the liquor and the size of the bottle. UCE 4599 said to  
14 NIEH that they would all make money off of the liquor deal. NIEH said that if CHOW didn't want a  
15 share, NIEH would take it. UCE 4599 said CHOW says he doesn't want a share until it comes time to  
16 pay and that CHOW allowed him to do the deal by making introductions. UCE 4599 said CHOW  
17 pretends that he doesn't know the liquor is stolen. NIEH said he told CHOW several times that the  
18 liquor was stolen, including once in front of UCE 4599.  
19

20 On February 12, 2012, NIEH and CHOW were intercepted, pursuant to Court Order, talking in  
21 NIEH's vehicle. NIEH said he wanted to test if UCE 4599 was a "snitch." CHOW said NIEH wouldn't  
22 be able to tell and that if UCE 4599 was a snitch, he was a very good one. CHOW said if they drove  
23 UCE 4599 away, they would just make less money. NIEH said that UCE 4599 was interested in doing  
24 business with LI and CHANTHAVONG. CHOW said that if UCE 4599 thought he could set a bait  
25 through LI to catch CHOW, CHOW would isolate himself from UCE 4599's contacts with LI and  
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1 CHANTHAVONG and let them deal with themselves. CHOW said he did not want to know what they  
2 did and he could claim that he was not in that business.

3 On February 13, 2012, UCE 4599 conducted reverse money laundering deals with NIEH and  
4 CHIU. The deal with NIEH was for \$60,000 and UCE 4599 paid NIEH \$6,000 for conducting the  
5 transaction. The deal with CHIU was for \$20,000 and UCE 4599 paid CHIU \$2,000.

6 On February 14, 2012, NIEH assisted UCE 4599 in purchasing 4 pounds of marijuana from  
7 Kongphet CHANTAVONG for \$5,000. CHANTHAVONG was introduced to UCE 4599 as a member  
8 of the CKT by CHOW and NIEH. **I believe this demonstrates probable cause for a violation of Title**  
9 **21, United States Code, Sections 841 and 846 by NIEH and CHANTHAVONG.**

10 On February 16, 2012, NIEH and CHOW were intercepted talking about the liquor deal and  
11 CHOW advised NIEH how to steer the negotiations.

12 On February 16, 2012, UCE 4599 paid CHOW \$2,000 for allowing him to work with his people.  
13 UCE 4599 presented CHOW with an envelope containing \$2,000. UCE 4599 explained they had a good  
14 week with the outcome of the Super Bowl. CHOW stated he would not argue with UCE 4599 and said  
15 he loved UCE 4599. UCE 4599 told CHOW he could no longer get 100 cases of the liquor for Tina  
16 LIANG because he couldn't "sit on" it, and now it would be 50 cases of liquor. They discussed  
17 negotiating the deal with Tina and Jane LIANG.

18 On March 5, 2012, UCE 4599 and NIEH met with TINA LIANG to negotiate the sale of 50  
19 cases of Hennessy XO. TINA LIANG stated she talked with CHOW on several occasions about the  
20 deal. TINA LIANG said she was concerned that the alcohol would be counterfeit, but that CHOW  
21 reassured her that the alcohol was not counterfeit and that UCE 4599 could be trusted. TINA LIANG  
22 then asked UCE 4599 if he could help her with bulk cash smuggling from New York to San Francisco.

23 On March 9, 2012, UCE 4599 sold purportedly stolen liquor to TINA LIANG, JANE LIANG,  
24 and Brian TILTON. The deal was set up by NIEH and CHOW. CHOW demonstrated that he believed  
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1 the liquor was stolen by talking to NIEH and scolding NIEH for talking about it over the phone when  
2 NIEH described it as liquor from the black market. The deal was 50 cases of Hennessy XO,  
3 purportedly stolen in New Jersey, and then transported to California, for \$30,000 cash. TILTON  
4 assisted by paying the money to UCE 4599 and by testing the Hennessy XO to make sure that it was  
5 not counterfeit. On March 13, 2012, UCE 4599 gave CHOW \$5,000 in cash as a payment for assisting  
6 in the liquor deal. They discussed TINA LIANG and her businesses. **I believe this demonstrates**  
7 **probable cause for a violation of Title 18, United States Code, Sections 371, 2314, 2315 and 2 by**  
8 **Tina LIANG, Jane LIANG, Brian TILTON, NIEH and CHOW.**

10 On April 19, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for  
11 \$70,000 and UCE 4599 paid NIEH \$7,000 for the transaction. NIEH also provided UCE 4599 with a  
12 Rossi Firearms .22 caliber revolver and seven rounds of .22 caliber ammunition, free of charge.

14 On April 20, 2012, UCE 4599 paid CHOW \$2,000. UCE 4599 presented CHOW with a white  
15 envelope containing \$2,000. UCE 4599 informed CHOW he and NIEH had a great quarter and thanked  
16 CHOW for the opportunity to work with NIEH. CHOW said he would not argue with UCE 4599. UCE  
17 4599 thanked CHOW again for the opportunity to work with NIEH. CHOW responded by saying, "I  
18 didn't give you that much opportunity, did I?" UCE 4599 and CHOW laughed.

19 On May 10, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for \$60,000  
20 and paid NIEH \$6,000 for conducting the transaction.

22 As indicated above, CHOW had previously expressed that he did not trust CHIU to continue  
23 laundering money with UCE 4599. On May 2, 2012, CHOW was intercepted pursuant to Court Order  
24 talking with NIEH about whom to steer UCE 4599 to within the organization to launder money. CHOW  
25 expressed concern about using YUN because she was close to NIEH and had a lot of bank accounts.  
26 They discussed using James PAU, YUN's husband.

1 On May 3, 2012, UCE 4599 and NIEH met with YUN and PAU. During the ride to the meeting,  
2 NIEH and UCE 4599 discussed that CHOW didn't want UCE 4599 to use YUN to launder money  
3 because she handled CHOW's personal finances and for the CKT. NIEH recommended PAU to launder  
4 money. At lunch, when PAU and CHOW had walked away, UCE 4599 described to YUN that his  
5 money came from a Mendocino County marijuana operation and illegal gambling businesses. PAU  
6 joined the conversation after and UCE 4599 asked YUN how she would launder money with UCE 4599  
7 and they discussed setting up a company. YUN and PAU expressed interest in laundering money for  
8 UCE 4599, but reiterated that they would need to get CHOW's permission to do it. YUN and PAU  
9 shook hands with UCE 4599. UCE 4599 asked YUN if she and PAU were going to approach the  
10 relationship with UCE 4599 as a team and YUN replied "yeah." NIEH then received a call from  
11 CHOW and handed the phone to YUN. YUN walked outside to speak with CHOW but the call was  
12 intercepted pursuant to Court order. CHOW told YUN she had a huge responsibility. YUN said she  
13 acknowledged that and that's why she would let PAU handle it. CHOW said they would discuss it later  
14 on. YUN said that she thought CHOW approved working with UCE 4599 early on and that's why she  
15 pursued it. CHOW said he did not approve. YUN said that NIEH told YUN that he had told CHOW.  
16 CHOW said there was nothing for him to say since it does not involve him. CHOW told YUN to call  
17 him when she is done with the matter. YUN returned to the table and UCE 4599 said he was buying  
18 lunch for his two new business partners (YUN and PAU). YUN told UCE 4599 that his sales pitch had  
19 worked. During the ride after, they discussed people in a real estate scam getting caught. PAU said  
20 people who use their brains to steal as opposed to a gun are his "heroes." UCE 4599 told PAU they  
21 would get along fine. PAU said "big cut, big risk" and advised UCE 4599 to keep everything under the  
22 radar. Later, NIEH told UCE 4599 that everything CHOW asked PAU and YUN to do was a favor to  
23 CHOW and that PAU and YUN did not receive payment for services. NIEH said CHOW was playing  
24 dumb when he talked to YUN at lunch and did not want to implicate himself.  
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1 On May 6, 2012, NIEH and CHOW were intercepted in NIEH's car discussing allowing YUN  
2 and PAU to launder money for UCE 4599. CHOW discussed how he stays out of the transactions, but  
3 that YUN is CKT and if she got caught, it would be bad for all of them. CHOW discussed his defense is  
4 that he doesn't really know what the rest of them were doing. On May 16, 2012, UCE 4599 conducted a  
5 reverse money laundering deal with Leslie YUN for \$30,000 and paid her \$3,000 for conducting the  
6 transaction. NIEH picked up UCE 4599 in his car and drove to Millenium Therapeutics, a massage  
7 parlor where YUN had an office. UCE 4599 provided YUN with \$33,000 cash -- \$30,000 to launder  
8 and \$3,000 as payment for laundering. On May 22, 2012, \$30,000 was wired from a Bank of America  
9 account held by YUN into UCE 4599's fictitious business account. On May 24, 2012, UCE 4599 paid  
10 CHOW \$2,000 for allowing him to work with YUN and PAU. **I believe this demonstrates probable**  
11 **cause for a violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) and 2 by YUN,**  
12 **PAU, NIEH, and CHOW.**  
13

14  
15 On June 20, 2012, UCE 4599 conducted a reverse money laundering deal with YUN and PAU,  
16 with NIEH present. The deal was for \$60,000 and UCE 4599 paid them \$6,000 for conducting the  
17 transaction. NIEH told UCE 4599 that CHOW knew about the deals with YUN and PAU and that  
18 CHOW said "good luck." NIEH also discussed selling firearms to UCE 4599.

19 On June 27, 2012, UCE 4599 sold purportedly stolen liquor to Ming MA and Hon SO with  
20 assistance from NIEH. UCE 4599 sold 12 cases of Johnnie Walker Blue Label Scotch for \$6,480 to MA  
21 and SO at the New Asia Restaurant in Chinatown, San Francisco. UCE 4599 paid MA \$400 for his  
22 assistance in setting up the sale. UCE 4599 paid NIEH \$500 for his assistance.

23  
24 On June 27, 2012, UCE 4599 paid CHOW \$2,500. UCE 4599 asked CHOW to take a brief walk  
25 with him before dinner with NIEH and Keith JACKSON. During the walk, UCE 4599 handed CHOW  
26 an envelope containing \$2,500. UCE 4599 explained to CHOW there was a little extra money in the  
27 envelope because UCE 4599 worked with Ming MA selling stolen liquor to the New Asia Restaurant.  
28



1 UCE 4599 told CHOW he appreciated the opportunity to work with CHOW's people. CHOW  
2 repeatedly said "no, no, no", but took the envelope out of UCE 4599's hand immediately.

3 On July 6, 2012, NIEH picked up UCE 4599 and drove him to meet CHANTHAVONG. In Daly  
4 City, CHANTHAVONG gave UCE 4599 approximately 4 pounds of marijuana.

5 On July 19, 2012, UCE talked with NIEH. NIEH said CHOW wanted to know if UCE 4599 had  
6 access to cigarette filters. UCE 4599 said he couldn't just get filters. NIEH stated he assumed that UCE  
7 4599 did not have access to filters and that NIEH had told CHOW that UCE 4599 only had access to  
8 "finished product." NIEH also said he told CHOW that UCE 4599 "just rips off trucks." NIEH and  
9 UCE 4599 met with YUN and YUN said she had a customer in New York lined up for 50 master cases  
10 of cigarettes at \$32 per carton. YUN said she might have another customer for another 50 master cases.  
11 UCE 4599 expressed concern about being robbed and YUN said she was well protected in New York  
12 and that YUN would handle all the cash. YUN warned UCE 4599 to be careful since dealing in tobacco  
13 was a more serious offense.  
14

15 On August 9, 2012, UCE 4599 conducted a sale of 50 Master Cases of purportedly stolen  
16 cigarettes (in excess of 10,000 cigarettes) without any tax stamps on them with the assistance of YUN  
17 and NIEH. The cigarettes were exchanged for the money -- \$96,010 in cash -- with YUN and other  
18 individuals in Flushing, New York. UCE 4599 paid YUN \$12,010 for her part in setting up the sale and  
19 paid NIEH \$5,000 for his part.  
20

21 On August 16, 2012, UCE 4599 conducted a reverse money laundering deal with YUN and  
22 NIEH for \$60,000 each. YUN and NIEH were each paid \$6,000 for conducting the transaction.  
23

24 On August 16, 2012, UCE 4599 paid \$7,000 to CHOW for allowing him to work with his people  
25 and for the cigarette deal with YUN. The UCE presented CHOW with a white envelope containing  
26 \$7,000. The UCE informed CHOW he sold some cigarettes in New York with some people in CHOW's  
27 organization. The UCE thanked CHOW for the opportunity to work with his people. CHOW said "I  
28

1 didn't do anything." CHOW then said "any of our friends is your friends." CHOW repeatedly said "no,  
2 no, no" while taking the envelope of cash. The UCE told CHOW on two occasions not to take the  
3 envelope of cash if he felt uncomfortable. CHOW said "you guys are doing good." CHOW took the  
4 envelope and put it in his jacket pocket. CHOW said he would pay the UCE back once CHOW's book  
5 deal was signed. The UCE told CHOW he didn't have to pay the UCE back. The UCE explained if it  
6 weren't for CHOW and his people the UCE would not have had the opportunity to conduct illegal  
7 business in San Francisco. During that night, KEITH JACKSON informed UCE 4599 that his son, later  
8 identified as BRANDON JACKSON, was shipping approximately 300 pounds of marijuana to  
9 Memphis, Tennessee per month. KEITH JACKSON advised his son was making approximately  
10 \$50,000 per week. KEITH JACKSON advised his son was looking for a contact who could get large  
11 amounts of prescription medication like Oxycotin or Hydrocodone. UCE 4599 told KEITH JACKSON  
12 he may have someone who could facilitate the request.  
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14  
15 On September 8, 2012, UCE 4599 attended a CKT dinner. UCE 4599 walked into the restaurant  
16 and observed CHOW, NIEH, YUN, MA, PAU, MEI, and SIU all working at the event by performing a  
17 variety of functions. UCE 4599 sat at a table with KEITH JACKSON and BRANDON JACKSON.  
18 UCE 4599 agreed to set up a follow up meeting with BRANDON JACKSON and KEITH JACKSON to  
19 discuss the sale and transportation of narcotics. At one point in the evening, NIEH and MA pulled UCE  
20 4599 aside to discuss the previously arranged shipment of 15 cases of stolen liquor scheduled for  
21 September 10, 2012. NIEH and MA told UCE 4599 not to worry about off-loading the liquor in front of  
22 the restaurant. MA told UCE 4599 he would be interested in future shipments of any high end liquor  
23 UCE 4599 could procure. UCE 4599 sat down with LI and CHANTHAVONG. LI informed UCE 4599  
24 he forgot to bring a previously discussed bullet resistant vest for UCE 4599. LI also talked about  
25 procuring a gun for UCE 4599. LI had a .357 revolver he referred to as "Big Bertha" but UCE 4599  
26 declined the offer. LI told UCE 4599 if you run out of bullets you could use the gun as a hammer. LI  
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1 talked about getting UCE 4599 a .45 caliber gun.

2 On September 10, 2012, UCE 4599 sold purportedly stolen liquor to Han SO with the assistance  
3 of Ming MA and NIEH. The sale was for \$8,100 for 15 cases of Johnnie Walker Blue Label Scotch.  
4 UCE 4599 had previously told MA and NIEH that the liquor had been stolen. The delivery was to Hon  
5 SO at New Asia Restaurant. During the delivery, UCE 4599 told SO to be careful with the liquor and  
6 SO told UCE 4599 that he would be careful. UCE 4599 paid MA \$500 for his assistance. On  
7 September 19, 2012, UCE 4599 paid CHOW \$500 for the liquor deal. The UCE gave CHOW a white  
8 envelope containing \$500. The UCE paid CHOW \$500 for his assistance in the sale of purportedly  
9 stolen liquor on September 08, 2012 to MING MA, a.k.a. Bak Ban and Hon SO. **I believe this**  
10 **demonstrates probable cause for a violation of Title 18, United States Code, Sections 371, 2315 and**  
11 **2 by MA, SO, NIEH, and CHOW.** CHOW said he "could use this." CHOW said he wanted to  
12 introduce the UCE to his narcotics connection. CHOW talked about "honest mistakes." CHOW said he  
13 doesn't allow people around him to make "honest mistakes". CHOW mentioned people that were  
14 involved in the drug trade, and said that they were not very careful. CHOW told the UCE to be very  
15 careful when dealing with people. On the ride back to the UCE's apartment, CHOW and the UCE talked  
16 about the corrupt nature of politics in San Francisco. CHOW commented how San Francisco has  
17 changed over the years. While the city itself looks clean, CHOW believed San Francisco was dirtier  
18 because of public corruption. CHOW expressed his dislike for politicians and said "If I'm into the game,  
19 I would step on them, I would nail those guys." CHOW said "all the people, they play the little dirty shit  
20 around me." CHOW further added "Oh, I'm dirty too, you know, but I'm not dirty to my people."

21 On September 20, 2012, UCE 4599 had dinner with KEITH JACKSON, BRANDON  
22 JACKSON, and Marlon SULLIVAN. BRANDON JACKSON and SULLIVAN described their  
23 narcotics trafficking including transporting marijuana to the East Coast and Tennessee. BRANDON  
24 JACKSON and SULLIVAN were interested in UCE 4599 assisting them by providing transportation  
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1 assistance and supplying them with cocaine and/or other “hard drugs” to sell on their established routes.  
2 UCE 4599 began telling them that was a dangerous business and that they had to be very careful and  
3 ready for it. They described that they saw UCE 4599 as a potential mentor and that when he was ready  
4 to supply them, they would get into the larger business. For the next year and a half, KEITH  
5 JACKSON, BRANDON JACKSON, and SULLIVAN solicited UCE 4599 frequently to provide  
6 cocaine for them to sell. This is the inception of the narcotics conspiracy between these three as it  
7 relates to trafficking narcotics with UCE 4599. **I believe this and subsequent conduct demonstrates**  
8 **probable cause for a violation of Title 21, United States Code, Section 846 by Keith JACKSON,**  
9 **Brandon JACKSON, and SULLIVAN.**

11 On September 26, 2012, CHANTHAVONG, LI, and NIEH facilitated the sale of a firearm to  
12 UCE 4599 for \$600. The firearm was a Rossi .22 caliber, serial number 69874. CHANTHAVONG  
13 gave the firearm to UCE 4599 in his vehicle. LI told UCE 4599 that he had given the gun to  
14 CHANTHAVONG to sell to UCE 4599. All three, CHANTHAVONG, LI, and NIEH, were convicted  
15 felons at the time of the sale. According to contacts with the Bureau of Alcohol, Tobacco, Firearms and  
16 Explosives (hereafter “ATF”), and their records checks, none were licensed firearms dealers. The .22  
17 caliber firearm had “Made in Brazil” stamped on it. Research of information available on open source  
18 websites shows that the weapon was not manufactured in California. **I believe this demonstrates**  
19 **probable cause for a violation of Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by**  
20 **CHANTHAVONG, LI, and NIEH.**

22 On October 2, 2012, CHANTHAVONG and NIEH sold a firearm to UCE 4599 for \$1,000. The  
23 firearm was a Daewoo DR-200 .223 caliber rifle, serial number RA001216. Both CHANTHAVONG  
24 and NIEH were convicted felons at the time of the sale. According to ATF records checks, neither was  
25 a licensed firearms dealer. I have conducted research and determined that the Daewoo rifle was  
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1 manufactured by Kimber in Oregon. **I believe this demonstrates probable cause for a violation of**  
2 **Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by CHANTHAVONG, and NIEH.**

3 On October 11, 2012, UCE 4599 conducted reverse money laundering deals with NIEH and  
4 YUN, each for \$60,000. UCE 4599 paid \$6,000 each for conducting the transactions.

5 On October 18, 2012, UCE 4599 paid \$2,000 to CHOW. UCE 4599 told CHOW that UCE 4599  
6 was doing good business with NIEH. CHOW took the money and said thank you.

7 On October 24, 2012, Oakland Police Department and FBI executed searches pursuant to state  
8 search warrant at CHANTHAVONG's residence in Daly City. Inside, they found a grow with 91  
9 marijuana plants, scales, a pressed brick of approximately 1.78 kilos of cocaine, a Taurus semi-  
10 automatic pistol, .45 caliber, Model PT 145, and 18 rounds of ammunition. CHANTHAVONG was  
11 present in the home. They also found keys to a warehouse and, pursuant to search warrant, searched a  
12 warehouse at 2715 Magnolia Street in Oakland. There they found 496 marijuana plants, grow lights,  
13 other growing equipment, a red hydraulic press to press kilograms of powder narcotics with trace  
14 amounts of cocaine on it, a digital scale with trace amounts of cocaine on it, and other items. The drugs  
15 were tested by DEA Laboratory. **I believe this demonstrates probable cause for a violation of Title**  
16 **21, United States Code, Sections 841(a)(1)(B) and a violation of Title 18, United States Code,**  
17 **924(c) by CHANTHAVONG.**

18 On October 30, 2012, Antioch Police Department and FBI Agents conducted a search at a  
19 warehouse in Antioch, California. Law enforcement found a grow throughout the warehouse with 803  
20 marijuana plants, currency, indicia, and a map with the area of Michael MEI's house circled. Inside the  
21 grow, working, were Michael MEI's parents. The parents were arrested and then released. The plants  
22 tested positive as marijuana. On November 14, 2012, NIEH talked to UCE 4599 about the search and  
23 said that MEI's parents were arrested, but that the grow was actually MEI's grow. On December 12,  
24 2012, NIEH told UCE 4599 that MEI was YUN's supplier for marijuana. On March 29, 2013, UCE  
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1 4599 talked to MEI. UCE 4599 told MEI that he had heard about the search on MEI's grow and MEI  
2 responded "it was hectic, it was crazy, it was crazy. Everything is good." **I believe this demonstrates**  
3 **probable cause for a violation of Title 21, United States Code, Sections 841(a)(1)(B) by MEI.**

4 On November 19, 2012, UCE 4599 met with KEITH JACKSON and discussed Senator YEE.  
5 During the meeting, UCE 4599 and KEITH JACKSON discussed getting UCE 4599 back together with  
6 BRANDON JACKSON to discuss narcotics trafficking and money laundering.  
7

8 On December 12, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for  
9 \$70,000 and paid NIEH \$7,000 for conducting the transaction. On the same date, UCE 4599 paid  
10 CHOW \$2,000. UCE 4599 handed CHOW a white envelope containing \$2,000. UCE 4599 told  
11 CHOW he had a very successful year working with members of CHOW's organization. Specifically,  
12 UCE 4599 thanked CHOW for the opportunity to work with NIEH and YUN. CHOW said "you are  
13 doing good." UCE 4599 told CHOW "we are all doing good." UCE 4599 expressed his gratitude to  
14 CHOW for introducing UCE 4599 to good friends and trusted brothers. UCE 4599 told CHOW he had  
15 an upcoming meeting with SENATOR LELAND YEE to discuss having CHOW's ankle monitoring  
16 device removed. UCE 4599 told CHOW he introduced an individual through KEITH JACKSON who  
17 helped Senator YEE a great deal. UCE 4599 told CHOW that SENATOR YEE owes UCE 4599 and his  
18 family. UCE 4599 talked to CHOW about growing new illegal business opportunities over the  
19 following year. They discussed CHANTHAVONG being arrested for drugs and UCE 4599 wanting to  
20 launder money for TINA LIANG.  
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23 On January 10, 2013, UCE 4599 sold purportedly stolen cigarettes without tax stamps, with the  
24 assistance of James PAU and Leslie YUN. UCE 4599 met YUN and PAU in Flushing, New York. The  
25 cigarettes (in excess of 10,000 cigarettes) were sold for \$192,000. YUN and PAU received \$24,000 for  
26 setting up the deal.  
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1 On January 16, 2013, UCE 4599 paid both NIEH and CHOW \$7,000 for facilitating the cigarette  
2 deal in New York. UCE 4599 told NIEH and CHOW he was with JAMES PAU and LESLIE YUN the  
3 previous week. UCE 4599 sold purportedly stolen cigarettes to YUN and PAU's associates. UCE 4599  
4 presented CHOW with two white envelopes each containing \$7,000. UCE 4599 asked CHOW to pick  
5 an envelope. CHOW picked an envelope and said "that look like bigger one." NIEH took an envelope  
6 and said "thanks [UCE 4599]." UCE 4599 told CHOW and NIEH he was very impressed on how well  
7 PAU managed the stolen cigarette transaction. NIEH replied "PAU is no joke, man." UCE 4599 told  
8 CHOW he wouldn't have the opportunity to do business without CHOW's permission. CHOW said he  
9 didn't know PAU and YUN were in New York. UCE 4599 told CHOW it was better to keep CHOW  
10 out of the transaction because he was the Dai Lo. CHOW said "you guys are doing bad things." The  
11 UCE told CHOW that's how they make a living. CHOW jokingly replied "I'm rehabilitated. You are  
12 very, very bad." UCE 4599 told CHOW and NIEH he was surrounded by good people and trusted  
13 brothers. NIEH replied "Good people doing bad things." UCE 4599 told CHOW he would be meeting  
14 with Senator Leland YEE in the near future. The UCE told CHOW he would speak to YEE about  
15 having CHOW's ankle monitor removed. CHOW thought YEE would be scared to talk the UCE  
16 because of the UCE's criminal background. UCE 4599 explained YEE would have to earn the UCE's  
17 friendship by doing favors for UCE 4599. UCE 4599 told CHOW he was a loyal brother to CHOW and  
18 a good earner for CHOW's organization. UCE 4599 told CHOW he had a vested interest in having  
19 CHOW's ankle monitor removed because CHOW would have the ability to introduce UCE 4599 to  
20 more people. UCE 4599 told CHOW he had made UCE 4599 a lot of money because of CHOW's  
21 introductions to the right people. CHOW thought SENATOR YEE could not be trusted. UCE 4599  
22 agreed with CHOW. UCE 4599 told CHOW and NIEH he was very impressed with the way PAU  
23 managed the stolen cigarette transaction. The last time UCE 4599 sold stolen cigarettes to YUN's  
24 associates in New York it took over six hours. The cigarette deal on January 10, 2013, took slightly  
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1 over one hour. UCE 4599 told CHOW he trusted PAU so much, he didn't even bother counting the  
2 money owed for the stolen cigarettes. UCE 4599 explained details of the stolen cigarette transaction to  
3 CHOW and NIEH. Shortly after, NIEH asked UCE 4599 if he was able to obtain stolen liquor. UCE  
4 4599 told NIEH he would check with his associates in New Jersey. UCE 4599 said he believed there  
5 wasn't a lot of profit margin in the sale of the stolen liquor but would do it as a favor to CHOW and  
6 NIEH's associates. UCE 4599 told CHOW and NIEH he was supposed to meet with Al  
7 NHINGSAVATH on his most recent trip to New York City. NHINGSAVATH wanted UCE 4599 to  
8 exchange smaller denominations of U.S. currency for one-hundred dollar bills. UCE 4599 advised he  
9 was unsuccessful meeting with NHINGSAVATH while he was in New York. After lunch, CHOW,  
10 NIEH and UCE 4599 stood outside of the restaurant. CHOW talked about the CKT being a "secret  
11 society." CHOW wanted to focus on bringing attention to the positive things the CKT was doing in the  
12 community. UCE 4599 agreed with CHOW but told him there is also the other side of the CKT that had  
13 to "take care of business," referring to criminal activity. CHOW told UCE 4599 s/he, UCE 4599, was  
14 the "bad part" of the CKT. NIEH and CHOW drove UCE 4599 back to his apartment. During the ride,  
15 NIEH asked what type of stolen liquor UCE 4599 had available. NIEH also asked the UCE when the  
16 next round of "coffee" would be. The term coffee is code for money laundering. UCE 4599 told NIEH  
17 within a few weeks. CHOW advised UCE 4599 to slow down. UCE 4599 talked about being careful  
18 when choosing the right criminal activity to get involved with. UCE 4599 told CHOW he wanted to be  
19 safe and utilize the resources around him. CHOW told UCE 4599 he tries not to think about criminal  
20 activity but when he does, it's "nothing but trouble." UCE 4599 told CHOW he, CHOW, surrounds  
21 himself with good people. UCE 4599 hoped CHOW thought of him as a trusted brother. CHOW told  
22 UCE 4599 he was family and was a "good brother."

23  
24 On January 23, 2013, UCE 4599 purchased a firearm from CHANTHAVONG and LI for  
25 \$1,000. The firearm was a Ruger SR40, serial number 342-084-83, with two magazines and 28 rounds  
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1 of ammunition. According to Ruger, it manufactures firearms in New Hampshire and in Arizona and  
2 does not manufacture firearms in California. LI offered to get whatever weapons UCE 4599 wanted and  
3 asked UCE 4599 to put together a list. LI offered that he and CHANTHAVONG would do "collections"  
4 for UCE 4599, meaning that they would collect unlawful debts for UCE 4599, through a "good guy, bad  
5 guy" routine. LI said that when he scratched his head, that would be the signal for CHANTHAVONG  
6 to slap the guy in the face. UCE 4599 said he would consider it. They discussed one of LI's associates  
7 in his marijuana business who was arrested in Pennsylvania with 50 pounds of marijuana and asked  
8 UCE 4599 about his marijuana prices. **I believe this demonstrates probable cause for a violation of**  
9 **Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by CHANTHAVONG and LI.**

11 On February 5, 2013, UCE 4599 met with Tina LIANG. Tina LIANG asked if UCE 4599 was  
12 still charging five percent to launder money. UCE 4599 told Tina LIANG that he charged 4% to launder  
13 quantities under \$100,000 and 3% for quantities in excess of \$100,000. Tina LIANG stated that her  
14 associate was recently pulled over in a traffic stop and lost approximately \$170,000. Tina LIANG said  
15 another associate lost about the same amount. UCE 4599 told Tina LIANG that it was very risky to  
16 transport money from New York to San Francisco. Tina LIANG said she believed that members of  
17 CHOW's organization were transporting marijuana and selling it to people in Flushing, New York. Tina  
18 LIANG asked about any more access to stolen liquor. UCE 4599 told Tina LIANG that the profit  
19 margin wasn't big enough in stolen liquor. UCE 4599 told Tina LIANG that he preferred to sell stolen  
20 cigarettes. Tina LIANG said people recently got arrested for that in New York City and asked what  
21 brand of cigarettes UCE 4599 could get. Tina LIANG asked if UCE 4599 could assist in recovering the  
22 \$170,000 that was taken by law enforcement. Tina LIANG stated she was paying approximately \$1,800  
23 for a pound of marijuana. Tina LIANG told UCE 4599 that her associates were looking to launder  
24 approximately \$500,000 per week from New York to San Francisco. Tina LIANG said that she met  
25 someone in CHOW's organization named "Kevin" and that she trusted CHOW, but didn't trust "Kevin."  
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1 Tina LIANG said "Kevin" tried to sell Tina LIANG purportedly "Sour Diesel" grade marijuana. Tina  
2 LIANG said she found out that the purported "Sour Diesel" was actually marijuana of lesser quality.

3 On February 14, 2013, UCE 4599 conducted a reverse money laundering deal with NIEH for  
4 \$80,000 and paid NIEH \$8,000 for conducting the transaction. On the same date, UCE 4599 paid  
5 CHOW \$2,000. UCE 4599 gave CHOW an envelope containing \$2,000. UCE 4599 told CHOW s/he  
6 would be doing some illegal business with NIEH later in the day. The UCE thanked CHOW for the  
7 opportunity to work with his people. CHOW laughed and said "No, no, I didn't give you the  
8 opportunity; you make your own opportunity. Damn, that is bribery money dude, that's not good."  
9 CHOW thanked UCE 4599 and told the UCE he was a good friend and a trusted brother. NIEH drove  
10 CHOW to the Chinatown section of San Francisco. The UCE and CHOW joked about the UCE's  
11 relationship with NIEH. The UCE asked what CHOW thought NIEH and the UCE did at the UCE's  
12 apartment. CHOW responded "That's terrible dude, I don't want to know, that's illegal stuff, I don't  
13 want to know."  
14  
15

16 On March 29, 2013, UCE 4599 attended the CKT annual event. There, a member of SENATOR  
17 YEE's staff presented a proclamation from the California State Senate, provided by SENATOR YEE,  
18 for the CKT. UCE 4599 discussed conducting money laundering transactions for CHANTHAVONG,  
19 LI, and Albert NHINGSAVATH. CHANTHAVONG and Michael MEI described recent law  
20 enforcement busts of their marijuana grow operations. CHANTHAVONG said he was transporting 100  
21 pounds of marijuana to the East Coast per week and that he needed help laundering the funds. LI also  
22 discussed committing violence against others for the benefit of the CKT and for his own personal  
23 enjoyment. It was described to UCE 4599 that CHANTHAVONG and NHINGSAVATH reported to  
24 LI. LI, CHANTHAVONG and NHINGSAVATH asked about UCE 4599 laundering their drug money  
25 from the East Coast. UCE 4599 told them he would charge 4% for anything smaller than \$100,000 and  
26 3% for anything more than \$100,000.  
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1 On April 11, 2013, UCE 4599 conducted reverse money laundering deals with NIEH and YUN.  
2 The deal with NIEH was for \$70,000 and UCE 4599 paid NIEH \$7,000 for conducting the transaction.  
3 The deal with YUN was for \$30,000 and UCE 4599 paid YUN \$3,000 for conducting the transaction.

4 On April 16, 2013, UCE 4599 engaged with LI and Albert NHINGSAVATH to launder their  
5 money, traditional money laundering, by having an associate (another UCE) pick up cash in New Jersey,  
6 launder it through UCE 4599's "legitimate" business, and deliver cash in San Francisco to  
7 NHINGSAVATH. When I use the phrase "traditional" money laundering, I am referring to the UCE  
8 laundering actual proceeds of specified unlawful activity from the targets, which violates 18 U.S.C.  
9 Section 1956(a)(1), as contrasted with "reverse" money laundering where the targets agree to launder  
10 funds that the UCE has represented to be proceeds of specified unlawful activity, which violates 18  
11 U.S.C. Section 1956(a)(3). The money came from LI and NHINGSAVATH's illegal narcotics business,  
12 trafficking from the West Coast to the East Coast. UCE 4599's associate picked up \$50,000 in cash  
13 from an associate of LI and NHINGSAVATH later identified as Norge MASTRANGELO in New  
14 Jersey. The money was then laundered through UCE 4599's "accounts" and delivered – minus a 4%  
15 laundering fee – by UCE 4599 to NHINGSAVATH in San Francisco. These transactions promoted the  
16 illegal business as well as concealing the true nature and source of the funds. On April 17, 2013, UCE  
17 4599 paid \$2,500 to CHOW. UCE 4599 gave CHOW an envelope containing \$2,500. UCE 4599  
18 thanked CHOW for the opportunity to do business with NIEH, YUN, LI, and NHINGSAVATH.  
19 CHOW told UCE 4599 "Thank you." UCE 4599 told CHOW the envelope was open and to be careful  
20 not to drop it. CHOW replied, "I drop it in my pocket" then laughed. UCE 4599 thanked CHOW for  
21 smoothing over the relationship between Andy LI and Albert NHINGSAVATH. **I believe this**  
22 **demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(1)(A)**  
23 **and (B) and 2 by LI, NHINGSAVATH, MASTRANGELO, and CHOW.** CHOW later told UCE  
24 4599 how to share emails as "drafts" with other people so that law enforcement can't find them as "sent"

1 emails. CHOW asked UCE 4599 about his recent activity. UCE 4599 told CHOW his illegal gambling  
2 business was starting to slow down but was encouraged by the new opportunity to launder drug proceeds  
3 with Andy LI and Albert NHINGSAVATH. UCE 4599 told CHOW in the past, LI and  
4 NHINGSAVATH were having people transport large amounts of cash by strapping it to their bodies to  
5 avoid detection by airport security. CHOW told UCE 4599 back in the old days that was an acceptable  
6 way to transport cash but not by today's standards. UCE 4599 told CHOW he offered an expedited safe  
7 service in laundering their drug proceeds. UCE 4599 told CHOW that LI and NHINGSAVATH were  
8 laundering small amounts of cash. UCE 4599 told CHOW he would give CHOW a big portion of UCE  
9 4599's profit from the laundered money. UCE 4599 was hoping LI and NHINGSAVATH would start  
10 to launder larger sums of money with UCE 4599. CHOW told UCE 4599 he should let LI and  
11 NHINGSAVATH know UCE 4599's expectations. CHOW explained there are lots of smaller criminal  
12 crews in the San Francisco Bay Area. Each crew has their own leader. CHOW was not the leader of the  
13 smaller crews but when CHOW "calls them out" they all come out to support CHOW. CHOW said "If  
14 anyone fucks with me, they are done for." If one day CHOW needed the criminal crews he expected  
15 they would be there for him. CHOW told UCE 4599 if UCE 4599 had any problems with any of  
16 CHOW's associates UCE 4599 should let CHOW know. UCE 4599 asked ANDY LI if he was happy  
17 with the money laundering services provided by UCE 4599. LI and NHINGSAVATH were happy with  
18 UCE 4599's services. LI thought it was more about "getting your toes wet" and creating a trusting  
19 relationship with UCE 4599. If something happened to the money entrusted to UCE 4599, LI told UCE  
20 4599 he would "come after your ass."

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23  
24 On April 29, 2013, UCE 4599 conducted a money laundering transaction with LI,  
25 NHINGSAVATH, and MASTRANGELO. The money, \$80,314, had been picked up from  
26 NHINGSAVATH and MASTRANGELO in New Jersey on April 25, 2013. UCE 4599 returned  
27 \$77,100 to NHINGSAVATH and MASTRANGELO in San Francisco.  
28



1 On May 6, 2013, UCE 4599 purchased a Smith and Wesson, Model M&P 15-22, and eight  
2 rounds of .22 LR ammunition from KEITH JACKSON and BRANDON JACKSON. They discussed a  
3 cocaine deal. UCE 4599 also provided a \$5,000 check for "Leland Yee for Secretary of State" in  
4 exchange for the proclamation to the CKT.

5 On May 14, 2013, UCE 4599 completed a money laundering transaction with Albert  
6 NHINGSAVATH, MASTRANGELO, and LI. MASTRANGELO had delivered \$99,275 in New Jersey  
7 and UCE 4599 provided \$96,275 to NHINGSAVATH in San Francisco.

8 On May 15, 2013, UCE 4599 paid \$1,000 to CHOW. UCE 4599 thanked CHOW for fostering  
9 the relationship between LI, NHINGSAVATH, and UCE 4599. CHOW asked how LI and  
10 NHINGSAVATH were doing. UCE 4599 stated that they were doing well and he was laundering a lot  
11 of their money. UCE 4599 told CHOW he thought he would launder over one million dollars of drug  
12 proceeds with LI and NHINGSAVATH during the next 6 or 7 months. UCE 4599 also said he was  
13 unable to come to an agreement with YUN on the sale of cigarettes. NIEH was present during these  
14 conversations.  
15

16 On June 14, 2013, NIEH drove UCE 4599 to meet with YUN. During the drive, NIEH told UCE  
17 4599 that Xiu Ling LIANG, a/k/a Elaine LIANG, wanted UCE 4599 to launder money from Boston to  
18 San Francisco. NIEH called Elaine LIANG from his car phone. LIANG asked how much UCE 4599  
19 charged and NIEH said 10% for money laundering, 4% for exchanging money. Elaine LIANG said she  
20 usually does it twice a week for \$200,000 each time. CHOW called and NIEH described them trying to  
21 meet with Elaine LIANG. Later that day, UCE 4599 conducted a reverse money laundering deal with  
22 NIEH for \$77,000 and paid NIEH \$7,000.  
23

24 On June 19, 2013, UCE 4599 paid CHOW \$2,000 and told CHOW that he and NIEH had  
25 conducted business last week. CHOW told UCE 4599 he wouldn't say much other than "thank you."  
26 CHOW commented that UCE 4599 does nothing but conduct illegal business all day. They discussed  
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1 CHOW protecting associates with his security. They also discussed UCE 4599 doing business with  
2 Elaine LIANG. UCE 4599 told CHOW he was going to New York to conduct another cigarette deal  
3 with YUN and PAU. Later, CHOW asked what type of business UCE 4599 wanted to conduct with  
4 Elaine LIANG. UCE 4599 said money laundering, the same as with LI and NHINGSAVATH. CHOW  
5 said he would look into it for UCE 4599.  
6

7 On June 24, 2013, UCE 4599 conducted a purchase of firearms from BRANDON JACKSON,  
8 KEITH JACKSON, and Marlon SULLIVAN. UCE 4599 paid \$3,400 and received 3 firearms. They  
9 discussed UCE 4599 setting them up with a source of cocaine for their narcotics trafficking business.

10 On June 25, 2013, UCE 4599 conducted a purchase of firearms from BRANDON JACKSON,  
11 KEITH JACKSON, and SULLIVAN. UCE 4599 paid KEITH JACKSON \$5,300 and SULLIVAN  
12 \$1,400. According to ATF records checks, none of the three are licensed to deal in firearms. KEITH  
13 JACKSON told UCE 4599 that he was hoping that UCE 4599 could raise more money for SENATOR  
14 YEE. They provided UCE 4599 with one .22 caliber Ruger Model 10/22 carbine; one Cobray  
15 machinegun pistol; one Mossberg Maverick pump-type shotgun and 12 gauge rounds; one Smith and  
16 Wesson, Model 59 handgun; one Colt model MK IV series 80 handgun; one 7.62mm Clayco Sports  
17 AKS rifle; 38 rounds of ammunition; and two ballistic vests (including one that was stolen from FBI).  
18 They also discussed prices of kilograms of cocaine that they were soliciting UCE 4599 to allow them to  
19 purchase for trafficking. **I believe this demonstrates probable cause for a violation of Title 18,**  
20 **United States Code, Sections 922(a)(1) and 2 by Keith JACKSON, Brandon JACKSON, and**  
21 **SULLIVAN.**  
22  
23

24 On July 12, 2013, UCE finished a traditional money laundering transaction involving LI,  
25 NHINGSAVATH, and MASTRANGELO. MASTRANGELO had delivered \$92,860 in New Jersey,  
26 and UCE 4599 gave MASTRANGELO \$89,160 in San Francisco. NHINGSAVATH asked if it would  
27 be okay to introduce another member of his organization to drop off money, named "Brian."  
28

1 On July 18, 2013, UCE 4599 conducted a deal of purportedly stolen and contraband cigarettes  
2 arranged by YUN and PAU. UCE 4599 met with YUN and PAU in Flushing, New York. The deal was  
3 for 100 master cases which is 120,000 cigarettes (far more than the 10,000 required to trigger the  
4 contraband cigarette statute). YUN agreed to pay \$168,000 for the 100 master cases. PAU and YUN  
5 met the UCEs in New York and went to confirm the merchandise. UCE 4599 wanted to know how  
6 PAU wanted his cut. PAU said to talk to YUN since she was responsible for finances. PAU said "I just  
7 do the work, and George [NIEH] takes care of the Old Man [CHOW]." PAU reiterated that his position  
8 in the CKT was "415," the "white paper fan." PAU said that YUN was the bookkeeper for the Tong.  
9 PAU described that NIEH and CHANTHAVONG were responsible to protect CHOW. LI was "426"  
10 within the Tong, which made him a fighter, and made the shape of a gun with his hand. PAU said that  
11 he, PAU, would be responsible for making the call on a hit and LI would be responsible for carrying it  
12 out. PAU said that CHOW encouraged them to grow their illegal business by working with cultures  
13 outside of the Chinese community. PAU said that LI works directly with CHOW. PAU discussed the  
14 occasional need to kill people by the CKT. The cigarettes were sold for \$167,900. The money  
15 delivered was short \$17,900, but later paid by NIEH to UCE 4599.

16  
17  
18 On July 22, 2013, UCE 4599 conducted a traditional money laundering deal with LI,  
19 NHINGSAVATH, and MASTRANGELO. MASTRANGELO had delivered \$45,000 on July 19, 2013  
20 in New Jersey and UCE 4599 delivered \$43,200 to NHINGSAVATH in San Francisco.

21  
22 On July 23, 2013, UCE 4599 collected \$17,900 from NIEH that was still owed on the cigarette  
23 deal. UCE 4599 said he was surprised YUN shorted him. CHOW said "you guys are bad people."  
24 UCE 4599 counted \$5,000 from the cash and gave it to CHOW and thanked him. UCE 4599 said they  
25 would not have the opportunity to make money without CHOW's permission. UCE 4599 told CHOW  
26 that the cigarette deal with PAU and YUN was successful. CHOW thanked UCE 4599 and said "I never  
27 did anything." NIEH laughed and said "well, I did." UCE 4599 also gave \$5,000 to NIEH. UCE 4599  
28

1 reminded CHOW that CHOW had previously said that "I am successful when my brothers are  
2 successful." UCE 4599 reiterated that the cigarette deal went well and that PAU managed the  
3 transaction in New York. CHOW agreed that it was important to handle illegal business in a different  
4 location well. UCE 4599 said that he had faith in PAU and YUN. CHOW said "you're lucky you know  
5 people." **I believe this demonstrates probable cause for a violation of Title 18, United States Code,**  
6 **Sections 371, 2315, 2342, 2344, and 2 by PAU, YUN, NIEH, and CHOW.** UCE 4599 and CHOW  
7 discussed Elaine LIANG following up to get money laundered by UCE 4599. UCE 4599 said he wasn't  
8 worried about getting shorted on the money for the cigarette deal because YUN's associates knew that  
9 UCE 4599 was affiliated with CHOW. CHOW smiled and said "are you sure?" They talked about a  
10 heroin deal proposed by LI to UCE 4599. CHOW asked UCE 4599 if he'd ever dealt in heroin before  
11 and UCE 4599 said his associates in New Jersey have. CHOW said it was a very tempting proposition.  
12 UCE 4599 asked for CHOW to vouch for him with the 14K Triad. CHOW said he would when he met  
13 them. CHOW boasted about all the different criminal enterprises that he knew, including motorcycle  
14 gangs. CHOW said "China White" [high grade heroin] is a scandalous market and it is hard to succeed.  
15 CHOW said he had been approached, but declined and described how to deal in heroin. CHOW told  
16 UCE 4599 not to deal in heroin. UCE 4599 said he would not, but just make the right introductions  
17 between other people, like CHOW does for UCE 4599.

18  
19  
20 On August 2, 2013, UCE 4599 met with BRANDON JACKSON and KEITH JACKSON to  
21 discuss purchasing firearms. They discussed that BRANDON's source was "Rinn," later identified as  
22 Rinn ROEUN. KEITH JACKSON stated that SENATOR YEE was also associated with a person who  
23 was an international arms dealer who was shipping large stockpiles of weapons into a foreign country.  
24 KEITH JACKSON described that SENATOR YEE met the arms dealer a long time ago and had been  
25 working with him to ship weapons to a foreign country.

26  
27 On August 5, 2013, UCE 4599 met KEITH JACKSON and BRANDON JACKSON to purchase  
28

1 weapons. UCE 4599 paid them \$2,000 to purchase several weapons – Norinco 7.62mm x 39mm SKS  
2 rifle with a magazine; Norinco 7.62mm x 39mm rifle with a high capacity drum magazine; one semi-  
3 automatic 9mm Uzi pistol, Model 8 with a magazine; two additional magazines; 78 rounds of 7.62mm x  
4 39mm ammunition. During the meeting, KEITH JACKSON said that he talked to SENATOR YEE  
5 about introducing UCE 4599 to the arms dealer they had previously discussed. According to KEITH  
6 JACKSON, SENATOR YEE requested that UCE 4599 raise additional campaign contributions for  
7 SENATOR YEE's campaign for California Secretary of State. UCE 4599 said he would make a  
8 contribution for an initial meeting and that, if it was successful, UCE 4599 would provide SENATOR  
9 YEE with a lot more money. KEITH JACKSON stated that SENATOR YEE also has friends who are  
10 trying to move weapons into a foreign country. KEITH JACKSON said he would try to meet with the  
11 arms dealer over the next couple days.  
12

13  
14 On August 8, 2013, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON to  
15 purchase four weapons for \$6,900. The weapons were one AR-15 type rifle with no serial number or  
16 manufacturer stamp; one black Intratec 9mm Luger Mod. Tec 9 assault pistol; one Springfield Armory,  
17 Model 1911-A1 .45 caliber pistol; one Bushmaster Carbon-15, .223 caliber rifle; 16 rounds of .223  
18 ammunition and miscellaneous gun parts.

19 On August 9, 2013, in Atlanta, Georgia, Serge GEE dropped off \$93,780 to a UCE for  
20 laundering. On August 11, 2013, UCE 4599 completed the money laundering transaction involving  
21 GEE, Xiu Ling LIANG, and NIEH. NIEH told UCE 4599 that he had discussed the transaction with  
22 CHOW and that CHOW had said that UCE 4599 should have charged for airline tickets. NIEH and  
23 UCE 4599 met with Elaine LIANG and GEE. UCE 4599 asked what type of marijuana GEE was  
24 selling and GEE said it was indoor grows for \$3,800 per pound. GEE said he was nervous about flying  
25 with a lot of cash. GEE said he sends several hundred pounds of marijuana per week to the east coast.  
26 UCE 4599 provided GEE with \$90,180. GEE offered to sell Molly (powder MDMA) to UCE 4599 for  
27  
28

1 \$18,000 per unit. GEE described having regular drivers and that he also sold kilos of cocaine for  
2 \$38,000. GEE said he trafficked about 200-300 pounds of marijuana per week in Atlanta. UCE 4599  
3 provided NIEH with \$1,000 for his assistance. NIEH told UCE 4599 "you got to thank the Old Man  
4 [CHOW] that he went to put his name out there." NIEH told UCE 4599 that he, NIEH, told CHOW  
5 about every criminal business opportunity that UCE 4599 has conducted. NIEH said CHOW wanted to  
6 know about it.  
7

8 Later on August 11, 2013, UCE 4599 arranged a meeting with KEITH JACKSON, BRANDON  
9 JACKSON, and SULLIVAN to discuss firearms purchases and cocaine trafficking.

10 On August 16, 2013, Norge MASTRANGELO and another individual dropped off \$199,900 to a  
11 UCE in New Jersey to be laundered. On August 19, 2013, UCE 4599 delivered \$194,000 to  
12 NHINGSAVATH in San Francisco.  
13

14 On August 26, 2013, UCE 4599 met with KEITH JACKSON, BRANDON JACKSON and  
15 SULLIVAN to purchase a firearm for \$600. The firearm was a Luger 9mm Model Tec 9 assault pistol  
16 with an extended magazine and 50 rounds of Remington 9mm Luger ammunition.

17 On August 27, 2013, UCE 4599 completed a traditional money laundering deal with GEE, and  
18 Elaine LIANG. On August 26, 2013, GEE delivered \$155,900 to a UCE in Atlanta. On August 27,  
19 2013, UCE 4599 delivered a box of cash to GEE and ELAINE LIANG, with approximately 4%  
20 retained.  
21

22 On August 27, 2013, UCE 4599 met with BRANDON JACKSON and Rinn ROEUN to discuss  
23 purchasing additional firearms. UCE 4599 told ROEUN he was arming his marijuana grows in  
24 Mendocino County. ROEUN also offered mines, hand grenades and C4. ROEUN discussed firearms  
25 for sale and also offered to perform protection services for UCE 4599. ROEUN also offered services to  
26 UCE 4599 "if you want somebody gone." UCE 4599 asked how much ROEUN charged for killing  
27 someone. ROEUN said \$10,000. UCE 4599 told ROEUN he had someone in mind and would pay  
28



1 \$25,000 for it. ROEUN said he would keep that extra \$15,000 then. UCE 4599 began describing the  
2 fictitious person who he wanted killed. ROEUN left the table to go to the bathroom. UCE 4599 asked if  
3 ROEUN was the person that BRANDON JACKSON was referring to when he told UCE 4599 that he,  
4 BRANDON JACKSON, had the capabilities to kill someone if needed. BRANDON JACKSON replied,  
5 "he could do it, or I could do it too." After returning to the table, ROEUN acknowledged that he had  
6 provided the last batch of guns for UCE 4599. ROEUN said he just needed the "specs" for the murder  
7 for hire, "is there an alarm, how many people are in the house?" ROEUN also confirmed he had  
8 provided the ballistic vests that UCE 4599 bought. ROEUN said they were straight from SFPD, but  
9 BRANDON JACKSON corrected him that they were from FBI and ROEUN said "oh yeah, yeah."

11 On August 28, 2013, UCE 4599 was in Las Vegas, Nevada and called ROEUN from his cellular  
12 telephone, after missing a call from ROEUN's cellular telephone earlier. ROEUN said, in connection  
13 with the murder for hire, he had spoken to "the guy" and asked UCE 4599 to provide a photograph and  
14 address of the victim. ROEUN said his guy needed two to three weeks to do his "homework" on the  
15 victim and then the "job will get done." ROEUN said he would pick up the picture and address of the  
16 intended victim from UCE 4599. UCE 4599 told ROEUN he wanted to give the victim another chance  
17 to redeem himself but if it did not work out, then UCE 4599 would hire ROEUN. ROEUN said "okay, I  
18 mean, I got you." **I believe this demonstrates probable cause for a violation of Title 18, United**  
19 **States Code, Section 1958 by ROEUN.**

21 On August 30, 2013, an associate of NHINGSAVATH dropped off \$114,860 with a UCE in  
22 New Jersey. On September 3, 2013, UCE 4599 completed a traditional money laundering deal with  
23 MASTRANGELO, LI, and NHINGSAVATH. On September 3, 2013, UCE 4599 arranged with  
24 NHINGSAVATH to drop off \$111,415 in a brown paper bag with an individual known to be associated  
25 with NHINGSAVATH. After the transaction, UCE 4599 confirmed the drop off with NHINGSAVATH  
26 via a telephone call between UCE 4599 and NHINGSAVATH.  
27  
28

1 On September 3, 2013, GEE had arranged with a UCE in Atlanta, Georgia, to pick up \$76,030 in  
2 cash from two unknown individuals. GEE directed the UCE to the two individuals via phone calls and  
3 text messages. The two individuals were a white male and white female who let the UCE talk to GEE  
4 on the phone while handing the UCE a bag with cash in it, and GEE stated that it was "76" in the bag.  
5 On September 6, 2013, UCE 3322 completed a traditional money laundering deal with GEE and Elaine  
6 LIANG. On September 6, 2013, UCE 3322 delivered \$73,000 to GEE. GEE then left with an  
7 individual later identified as Gary CHEN.  
8

9 On September 9, 2013, in Atlanta, Georgia, GEE arranged for an unknown person to deliver  
10 \$203,000 in shrink-wrapped packages to a UCE. On September 10, 2013, UCE 4599 completed a  
11 traditional money laundering deal involving NIEH, GEE and Elaine LIANG in Millbrae, California. On  
12 September 10, 2013, UCE 4599 delivered a FedEx box with \$195,000 to GEE and Elaine LIANG. GEE  
13 took out some of the money and gave it to LIANG and said "pay the rent." GEE discussed paying UCE  
14 4599 monthly to launder \$3,000,000 per month. GEE said he was distributing approximately 800  
15 pounds of marijuana per month. UCE 4599 paid NIEH \$1,000 for his assistance. NIEH described that  
16 CHOW had a fight with LI and had a falling out with LI and CHANTHAVONG. NIEH said CHOW  
17 had ordered NIEH to "pop" LI the next time he saw him, but NIEH was hoping they would work out  
18 their problems in a civil way. On September 12, 2013, UCE 4599 met with NIEH and CHOW. CHOW  
19 told UCE 4599 that he was a "hustler." UCE 4599 gave CHOW an envelope with \$3,000 and  
20 apologized for not getting it to CHOW sooner. CHOW thanked UCE 4599 and told him not to worry  
21 about the delay. UCE 4599 told CHOW he was making a lot of money working with Elaine LIANG and  
22 would not have had that opportunity if CHOW had not talked to Elaine LIANG on UCE 4599's behalf.  
23 CHOW laughed and told UCE 4599 to stop "doing illegal stuff." UCE 4599 told CHOW that LIANG  
24 and her son, GEE, were transporting large amounts of drugs to the east coast and making a lot of money.  
25 CHOW warned UCE 4599 to be careful. UCE 4599 asked if CHOW knew GEE and CHOW said "of  
26  
27  
28

1 course.” CHOW said not to trust anyone. **I believe this demonstrates probable cause for a violation**  
2 **of Title 18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by Elaine LIANG, GEE,**  
3 **NIEH, and CHOW.**

4 On September 13, 2013, UCE 4599 met with LI and NHINGSAVATH in San Francisco to  
5 conclude a traditional money laundering deal. On September 11, 2013, MASTRANGELO and an  
6 associate had delivered \$262,435 to a UCE in New Jersey. On September 13, 2013, UCE 4599  
7 delivered \$200,000 to NHINGSAVATH in a FedEx box. UCE 4599 told LI he was looking to purchase  
8 3-5 pounds of indoor marijuana. LI said it would cost \$2,600 per pound. LI described that he fought  
9 CHOW because CHOW never owned up to ordering the 1991 arson committed by LI where LI was  
10 severely burned. LI said it was a “chain of command” issue. LI wanted to “smash” people who spread  
11 rumors about his fight with CHOW. UCE 4599 told LI that his people in New Jersey were not as  
12 reliable as they should be. LI said he would fix that. On September 17, 2013, UCE 4599 met with  
13 NHINGSAVATH and delivered the remaining \$55,125.  
14  
15

16 On September 13, 2013, UCE 4599 met with KEITH JACKSON and said he was skeptical of  
17 SENATOR YEE’s ability or desire to introduce him to the arms dealer. KEITH JACKSON said it was a  
18 real opportunity and that it was SENATOR YEE who approached JACKSON with the opportunity.  
19 JACKSON said that the trafficker was “the real deal” but wanted to move at a slower pace.  
20

21 On September 13, 2013, UCE 4599 met with ROEUN to purchase firearms. ROEUN delivered a  
22 TAPCO AK-47 assault rifle with a scope and flashlight and a magazine for \$2,000. UCE 4599 told  
23 ROEUN that he had decided to follow through with the murder for hire after the holidays and would pay  
24 \$25,000. UCE 4599 said he would provide a photo and an address and ROEUN said “the job will get  
25 done.”

26 On September 18, 2013, UCE 4599 completed a traditional money laundering deal with GEE  
27 and ELAINE LIANG. On September 16, 2013, a UCE had picked up \$107,400 in shrink-wrapped  
28

1 packages from an associate of GEE. The associate stated that he would likely be the person making  
2 future cash transactions. On September 18, 2013, UCE 4599 rode with NIEH to meet GEE and  
3 ELAINE LIANG to deliver the cash minus 4% transaction fee. After the meeting, GEE and ELAINE  
4 LIANG left and GEE kept the FedEx box and got into a car registered to Anthony LAI.

5 On September 18, 2013, UCE 4599 met with LI and CHANTHAVONG in San Francisco. LI  
6 delivered a brown cardboard box and said it had five pounds of "Sour Diesel" [marijuana]. UCE 4599  
7 paid LI \$13,000. They walked to talk to CHANTHAVONG. CHANTHAVONG said that law  
8 enforcement was trying to eradicate large scale outdoor grows. A presumptive test showed positive for  
9 marijuana. **I believe this demonstrates probable cause for a violation of Title 21, United States**  
10 **Code, Section 846 by CHANTHAVONG and LI.**

11 On September 20, 2013, UCE 4599 met with ROEUN in San Francisco. ROEUN provided UCE  
12 4599 with a Calico, Model M-951, 9mm pistol with a threaded barrel fitted with a silencer. ROEUN  
13 stated that the silencer was homemade but that it was operational.

14 On September 26, 2013, UCE 4599 completed a traditional money laundering deal started earlier  
15 that day in Atlanta. GEE met with a UCE in Atlanta and delivered \$150,000 to that UCE in a white  
16 plastic garbage bag inside of a brown leather bag. On the same date, UCE 4599 and NIEH met with  
17 Elaine LIANG at a restaurant in Millbrae, California. UCE 4599 provided Elaine LIANG with a FedEx  
18 box containing \$139,200.

19 On October 1, 2013, UCE 4599 completed a traditional money laundering deal with GEE.  
20 Earlier that day, CHEN had delivered \$189,780 in cash to a UCE in New Jersey. Later, NIEH picked up  
21 UCE 4599 and UCE 4599 delivered \$182,110 to GEE in Millbrae. GEE's driver was identified as  
22 Anthony LAI.

23 On October 2, 2013, UCE 4599 arranged to meet CHOW and NIEH to provide a payment to  
24 CHOW for recent money laundering transactions with Elaine LIANG and GEE. UCE 4599 was picked  
25

1 up by NIEH and CHOW and driven to Yank Sing Restaurant. The UCE gave CHOW an envelope which  
2 contained \$1,500. UCE 4599 told CHOW the business with Elaine LIANG and GEE was going  
3 well. UCE 4599 surmised LIANG was the "Dragon Lady"(Boss). CHOW replied "She is." The UCE  
4 told CHOW that GEE was sending 800 pounds of marijuana per month to the east coast. CHOW  
5 thought there were a lot of confidential informants (CI) who were reporting derogatory information  
6 against CHOW. CHOW thought CI's used CHOW's name as a get out of jail free card. According to  
7 CHOW, there have been several large organized crime busts within the last ten years which may have  
8 contributed to law enforcement's suspicion of CHOW. CHOW admitted to associating with people who  
9 were involved in illegal activities. According to CHOW, he made a point never to ask these individuals  
10 about their criminal business. UCE 4599 told CHOW that when he conducts illegal business with NIEH  
11 they purposefully kept CHOW out of it. The UCE then explained the concept of La Cosa Nostra (This  
12 Thing Of Ours) and the principles of organized crime. CHOW thought establishing roles within a  
13 criminal organization was "common sense."  
14

15  
16 On October 4, 2013, UCE 4872 arranged a meeting with an associate of GEE in a parking lot of  
17 a coffee shop located in Atlanta, Georgia to conduct a money laundering transaction. The cash total was  
18 later confirmed to be \$150,000. The associate provided the cash to UCE 4599. On October 8, 2013,  
19 NIEH picked up UCE 4599 in San Francisco and drove to meet GEE. UCE 4599 delivered \$144,000  
20 cash. GEE said he would be traveling to China and asked UCE 4599 to conduct future deals with  
21 Anthony LAI. UCE 4599 paid NIEH \$600 for facilitating this money laundering deal.  
22

23 On October 8, 2013, UCE 4599 arranged a meeting with RINN ROEUN at his place of  
24 employment, an automobile glass repair shop, located in San Francisco, California, to purchase a  
25 firearm. UCE 4599 drove to 863 Bryant Street, San Francisco to meet with ROEUN. Once at the  
26 location, ROEUN entered UCE 4599's vehicle. UCE 4599 provided ROEUN with \$1,000. ROEUN  
27 gave the handgun to UCE 4599. ROEUN told the UCE he had several other assault rifles that would be  
28

1 available for purchase in the near future. Upon inspection, the handgun was a Taurus, Model Judge, .45  
2 caliber.

3       On October 10, 2013, UCE 4599 arranged a meeting with LI and CHANTHAVONG at a  
4 restaurant in San Francisco. The purpose of the meeting was to discuss illegal business opportunities  
5 with LI and CHANTHAVONG. LI asked UCE 4599 if he had the capability to launder drug proceeds  
6 in a similar fashion as to what UCE 4599 was doing in New Jersey with NHINGSAVATH. LI advised  
7 he was looking to launder approximately \$80,000 on a routine basis. UCE 4599 told LI he would charge  
8 a higher percentage fee to launder the money because it was a smaller amount than UCE 4599 usually  
9 dealt with. UCE 4599 told CHANTHAVONG he spoke with his associates in New Jersey and would be  
10 able to produce large quantities of Johnny Walker Black for \$22.00 per bottle. CHANTHAVONG said  
11 he would check with his associates to see if they would be interested. LI, CHANTHAVONG and UCE  
12 4599 discussed ways to hide assets so they could not be detected by government authorities. UCE 4599  
13 thought it was a bad idea to hide assets by putting them in their girlfriend's name. LI told UCE 4599 that  
14 CHOW hides his assets by putting them under his girlfriend's name.  
15

16       On October 15, 2013, UCEs 3010 and UCE 3129 arranged a meeting with "Jimmy" [later  
17 identified as Gary CHEN] and another individual in a parking lot at a retail store located in Saugus,  
18 Massachusetts, to conduct a money laundering transaction. At the meeting location, GARY CHEN was  
19 in the front passenger seat. CHEN approached the UCE vehicle with a gray backpack retrieved from the  
20 trunk and entered the front passenger area of the UCE vehicle. GARY CHEN introduced himself as  
21 "Jimmy". UCE 3129 admonished GARY CHEN for being late. GARY CHEN apologized. GARY  
22 CHEN stated he had \$102,500 and noted there was a paper note in the bag indicating such. UCE 3010  
23 told GARY CHEN that it was nice doing business with GARY CHEN and hoped that the relationship  
24 would continue. All parties depart the area in the vehicles they arrived in. The cash amount was later  
25 confirmed to be \$102,790.  
26  
27  
28



1 On October 16, 2013, UCE 4599 arranged to meet with LAI at a restaurant in San Francisco. The  
2 purpose of the meeting was to provide LAI with \$98,678 in laundered drug proceeds. LAI met with  
3 UCE 4599 on behalf of GEE, who was in China at the time. UCE 4599 provided LAI with a Federal  
4 Express Box containing \$98,678. LAI told UCE 4599 he operated an indoor marijuana cultivation  
5 operation in Oakland. The aforementioned marijuana grow was robbed and subsequently shut  
6 down. LAI did not bypass the power and owed PG&E approximately \$22,000. LAI told UCE 4599  
7 when he first met UCE 4599 he thought UCE 4599 looked like a "narc" (undercover narcotics  
8 officer). UCE 4599 dismissed the notion and told LAI he had been associated with CHOW for almost  
9 four years and was time tested when it came to trust. UCE 4599 and LAI discussed the next money  
10 laundering opportunity in Boston scheduled for the following week. Both departed from the restaurant  
11 at the conclusion of the meeting. **I believe this demonstrates probable cause for a violation of Title**  
12 **18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by Elaine LIANG, GEE, CHEN, and**  
13 **LAI.**

14  
15  
16 On October 17, 2013, UCE 4599 arranged to meet KEITH JACKSON and MARLON  
17 SULLIVAN at a restaurant located in San Francisco. The purpose of the meeting was to discuss illegal  
18 activities with SULLIVAN and KEITH JACKSON. SULLIVAN and KEITH JACKSON were upset  
19 with the lack of progress regarding a purported cocaine transaction with UCE 4599's fictitious source of  
20 supply (SOS) for cocaine. UCE 4599 told SULLIVAN and KEITH JACKSON that due to a recent  
21 interdiction by law enforcement, UCE 4599's SOS was revamping his cocaine distribution  
22 strategy. According to KEITH JACKSON, they had money already allocated for the deal and were  
23 disappointed in the lack of progress. SULLIVAN asked UCE 4599 if he had the ability and resources to  
24 transport narcotics. UCE 4599 asked SULLIVAN if he still had the Postmaster contact in Memphis,  
25 Tennessee who facilitated the transportation of marijuana through the USPS. SULLIVAN acknowledged  
26 he still had the Postmaster contact.  
27  
28